

Facility:

Allied Signal -

Detroit Tar Plant

Location:

Detroit, Michigan

Photographer:

Gail Artrip

Camera: Film:

Canon GIII

Date:

Kodak ISO 200

July 30, 1992

Photo No.:

1

Portion of Baie Comeau pitch piles, no longer manufactured by Allied Signal.

Photo No.:

2

Photo shows crushed rock/dirt ground with typical ponding. Note the presence of dark liquids in pond.





Photo No.:

3

Containment diking along the River Rouge.

Photo No.:

4

One of the rail tankers near the center of the property shown in front of some of the coal tar feedstock tanks.



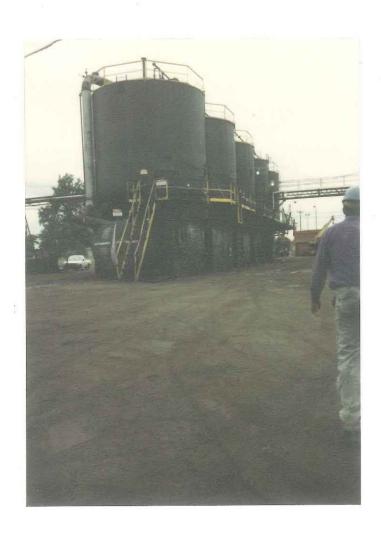


Photo No.:

5

Storage tanks for debris-containing coal tar prior to introduction into the filter press and dephenolizer.

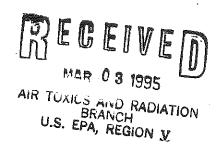


AlliedSignal Inc. Law Department P.O. Box 2245 Morristown, NJ 07962-2245

March 2, 1995

Via Overnight Delivery

Ms. Marietta Newell
Air Toxics and Radiation Branch (AT-18J)
Air and Radiation Division
Region V
United States Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604



Re: CAA § 114(a) Request for Information from AlliedSignal Inc.'s Detroit Tar Plant

Dear Ms. Newell:

As is AlliedSignal's normal practice in responding to Agency requests for information, the above-referenced request, which was received by the Detroit Plant on February 6, 1995, has been referred to the undersigned for further handling. In accordance with a telephone conversation which took place between Mr. Jeffrey Gahris of your staff and Mr. Bill Yanovitch of AlliedSignal on February 23, 1995, the date by which AlliedSignal's response to the request is due is March 3, 1995.

Responses to the request are set forth in an attachment to this letter. These responses were prepared on the basis of information provided by AlliedSignal personnel having knowledge of the Detroit Plant and its processes. Inasmuch as AlliedSignal is unaware of any statutory or regulatory authority that requires the Detroit Plant to provide the certification requested on page two of the request document signed by Mr. Kee, such certification is not set forth in AlliedSignal's response.

Should you have any questions concerning this matter, please do not hesitate to contact me at (201) 455-4033.

Very truly yours,

Gordon D. Quin

Senior Counsel

c: Rajendra Sinha, Chief Wayne County Health Department Air Quality Division

ATTACHMENT

1. Response to Request Number 1

Since approximately 1917, the Detroit Tar Plant ("Plant") has been refining crude coal tar, a material produced by the thermal distillation of coal in coke ovens. The final products from the refining process are electrode binder or anode pitch, roofing pitch, specialty pitches, driveway sealer tar base, creosote solution and carbolic oil. Units currently involved in manufacturing operations at the Plant are identified and described in the five subsections below. Attachment 1 contains several diagrams of the Plant site and the manufacturing process.

A. Continuous Coal Tar Distillation Unit ("Tar Heater")

Construction/operation of this unit began in 1955.

The tar heater distills coal tar continuously through two distillation columns. A single furnace provides heat for both columns in the tar heater. The first of the two columns (the "DH column") dehydrates the crude coal tar and then feeds the dehydrated tar to the tar heater vapor box ("THVB"). The THVB is used to flash lighter oils while retaining heavier pitch type materials. Oils are condensed and separated into various cuts in the tar distillation column.

Further separation of heavier materials in the THVB can be accomplished in the low temperature distillation system ("LTD"), which consists of another vapor box attached to a vacuum system. The LTD allows separation to occur at lower temperatures. When the THVB is run at higher temperatures, the LTD system can be bypassed (referred to as a "straight run").

B. Batch Stills

Construction/operation of these units began in approximately 1917.

The plant has three batch stills. These units operate by adding approximately 10,000 gallons of tar feed and underfiring the still until the desired softening point is reached. Flashed oils are condensed in one receiver tank without using a distillation column. The batch stills are the secondary means of production at the plant.

C. Roofing Pitch Barreling Operation

Construction/operation of the barreling system began in approximately 1917. The system was completely updated in 1994.

D. Storage Tanks

Set forth in Attachment 1 is a listing of current tanks which shows the contents, construction date and capacity of each tank.

F. Loading/Unloading Operations

Crude coal tar is received by barge at the dock facility, and by tank truck at two unloading stations and by railcar at nine unloading stations.

Pitch loading of railcars occurs at two locations. Tank trucks are loaded with pitch at six stations. Refined tar is loaded into tank trucks at three locations. Creosote and other tar cuts, excluding pitch, are loaded into tank cars at 13 locations.

Drummed products are shipped by flatbed truck.

2. Response to Request Numbers 2, 3 and 4

Attachment 2 consists of a table which summarizes the information requested in Request Numbers 2, 3 and 4. Not included in this summary is the Plant's former filter press operation, which was constructed/operated in 1989 and shut down indefinitely in 1991. Information on tank capacities is provided in Attachment 1. The organic polynuclear portion of VOC emissions has a "tar like" odor. Normal variability in the operation of combustion sources can result in visible emissions. Start up or upset conditions have the potential to result in high opacity.

3. Response to Request Number 5

Attachment 5 provides information on control devices for process equipment. The Plant has thus far been unable to locate the original manufacturer's design control efficiency data for the scrubbers.

4. Response to Request Number 6

Based on AP-42 emission calculations, estimated control efficiencies are provided in Attachment 6. These calculations were previously submitted with permit applications. No stack testing has been performed on the scrubbers.

5. Response to Request Number 7

The tar distillation unit has continuous monitors for temperature, pressure and flow rate. The batch stills have continuous temperature monitors. The range for any particular parameter will vary depending on raw material quality and product being produced. The result is a set of ranges that is too long to include in this response. Charts of process monitoring data are available at the Plant site for Agency inspection.

6. Response to Request Number 8

Operating practices that are employed to reduce emissions include: control of tank temperature; limiting time for sample procurement from sample vents; tightening of pump and valve packings.

All scrubbers are monitored daily for temperature and discharge pressure psig. More detailed checks are conducted weekly. The audit sheets used for these inspections are set forth in Attachment 8 and indicate the acceptable range for operating parameters. The magnitude of events outside of the operating range is almost always <10% above or below the limit. Occasional high temperature variations of this sort have been noted over the past three months. All daily and weekly check sheets are available for the Agency's inspection at the Plant.

7. Response to Request Number 9

Copies of current air emission operating permits, construction permits and certificates of operation are set forth in Attachment 9.

8. Response to Request Number 10

Recent suppliers of coal tar processed at the Plant include the following:

- A. National Steel Corp. Ecourse, MI
- B. Detroit Coke Detroit, MI
- C. Tonawanda Coke Corp. Tonawanda, NY
- D. Bethlehem Steel Lackawana, NY
- E. Koppers Industries Toledo, OH
- F. DoFasco, Inc. Hamilton, Ont.
- G. Algoma Steel Saulte St. Marie, Ont.

- H. U.S. Steel Gary, IN
- I. AK Steel Middletown, OH
- J. LTV Steel Warren, OH
- K. Stelco Inc. Nanticoke, Ont.
- L. Protexa Montcloya, Mexico
- M. Sloss Industries Birmingham, AL
- N. Reilly Industries Cleveland, OH
- O. Inland Steel
 East Chicago, IN

Materials occasionally processed by the Plant in the past for use as raw materials include tar oil, water gas tar, crude oil tank bottoms and driveway sealer. In 1992, a quantity of waste cooking oil which the Plant was unable to burn in its fluidized bed boiler was used as a raw material. Clean out materials from barges used by AlliedSignal to transport crude coal tar are used by the Plant as a raw material.

Crude coal tar is the only material currently being processed in the Plant. Responsive documents pertaining to the testing of these materials are set forth in Attachment 10.

9. Response to Request Number 11

Attachment 11 includes three diagrams which indicate the location of stacks and pressure relief valves. Data on stacks are as follows:

Batch stills - 50' high 30" diameter
Tar heater - ~81' high 54" diameter
York-Shipley/FBB - 152' high 36" diameter

10. Response to Request Number 12

Sources of fugitive emissions include: pumps, valves and flanges on transfer lines, as well as sampling ports on tanks and loading/unloading losses (including barreling).

EPCRA § 313 Form R data for 1993 indicate the following compounds and estimated fugitive emission releases:

Benzene	5490	pounds
Naphthalene	10070	pounds
Dibenzofuran	2353	pounds
Quinoline	360	pounds
Toluene	1690	pounds
Xylene	880	pounds
Styrene	341	pounds
Creosote	3016	pounds
Anthracene	1740	pounds

Elements of the Plant's program to reduce fugitive emissions include:

- Routine maintenance of pump and valve packings
- Historical installation of scrubbers at certain loading stations
- Reduction of sample volume/time required for sampling
- Maintenance of low tank/operating temperatures

11. Response to Request Number 13

Fuels currently used in the Plant's combustion sources are tar oils produced on-site and commercially purchased Number 6 fuel oil.

12. Response to Request Number 14

Odors are not subject to Agency jurisdiction through the Michigan State Implementation Plan, which is the purported focus of this request for information. The Plant has received two indirect odor complaints in the past six months via the Wayne County Health Department ("WCHD"). Any further information on this issue should be obtained from the WCHD.

13. Response to Request Number 15

Attachment 15 contains the March 18, 1991 WCHD APCD request for a Malfunction Abatement Plan for the fluidized bed boiler and the Plant's response to that request. Malfunctions during the past 12 months were limited to the FBB and ancillary equipment resulting in elevated opacity readings. During February 1994, there were 10 high opacity incidents. Three of these incidents were due to baghouse problems and seven

were attributed to fuel problems. In each case, appropriate steps were taken to alleviate the problem, up to and including shutdown of the FBB. Also included in Attachment 15 is a copy of the March 29, 1994 Quarterly Excess Opacity Report submitted to WCHD.

14. Response to Request Number 16

In accordance with the order contained in Attachment 16, Plant paved areas are swept twice weekly by an outside contractor. The on-site employee parking lot (approximately 3300 square yards) is sprayed with "Dust Bond" by Cousins Waste Control. Records of these activities are maintained at the Plant.

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AlliedSignal Inc. Law Department P.O. Box 2245 Morristown, NJ 07962-2245

February 24, 1995

Via Overnight Delivery

Mr. Michael Cunningham RCRA Enforcement Branch (HRE-8J) Region V United States Environmental Protection Agency 77 West Jackson Boulevard Chicago, Illinois 60604



OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION Y

Re: RCRA § 3007 Request for Information From AlliedSignal Inc.'s Detroit Tar Plant

Dear Mr. Cunningham:

As is AlliedSignal's normal practice in responding to Agency requests for information, the above-referenced request, which was received by the Detroit Plant on February 6, 1995, has been referred to the undersigned for further handling.

Reponses to the request are set forth in an attachment to this letter. These responses were prepared on the basis of information provided by AlliedSignal personnel having knowledge of the Detroit Plant and its processes. Inasmuch as AlliedSignal is unaware of any statutory or regulatory authority which requires a non-RCRA permitted facility such as the Detroit Plant to provide the certification requested in Request Number 12, such certification is not set forth in AlliedSignal's response.

Should you have any questions concerning this matter, please do not hesitate to contact me at (201) 455-4033.

Very truly yours,

Gordon D. Quin Senior Counsel

<u>ATTACHMENT</u>

1. Response to Request Number 1

Since approximately 1917, the Detroit Tar Plant ("Plant") has been refining crude coal tar, a material produced by the thermal distillation of coal in coke ovens. Neither the refining process, nor the products produced from that process, have changed significantly over the last several decades. The final products from the refining process are electrode binder or anode pitch, roofing pitch, specialty pitches, driveway sealer tar base, creosote solution and carbolic oil.

Crude coal tar is shipped to the Plant in rail cars, trucks and barges and stored in a number of on-site storage tanks. From this tank storage area, crude coal tar, supplemented with certain proprietary oils used for quinoline insoluble adjustment, are conveyed to either the continuous coal tar distillation unit ("Tar Heater") or to one of three batch stills.

The three batch stills operate by adding approximately 10,000 gallons of tar to a still and heating the material by underfiring the still until the desired softening point is reached. All the oils are collected within one tank. There is no distillation column on the batch stills.

The Tar Heater distills coal tar continuously through two distillation columns. A furnace, divided into two sections, provides the heat input. The first column is a dehydration ("DH") column and removes any water entrained in the crude tar. The dehydrated tar is then flashed in a Tar Heater Vapor Box ("THVB"). The high boiling point material is primarily pitch and remains as a liquid in the vapor box. The oils flash, remain as vapor and pass into the tar distillation ("TH") column, where the oils are separated into materials with various boiling points. Additional low boiling point materials in the liquid in the THVB can be further removed by the Low Temperature Distillation ("LTD") system. The LTD system consists of another vapor box connected to a vacuum system. The vacuum permits the removal of similar boiling point materials at low temperatures. Similar products can be produced by either using the LTD system or bypassing the LTD system. When the LTD system is bypassed, the temperatures of the material going into the THVB must be at a higher temperature in order to separate similar boiling point materials. The bypassing of the LTD system, when operating at these high temperatures, is referred to as a "straight run."

The two types of coal tar refining systems used at the Plant do not generate waste materials of any type which require special management practices on a daily or routine basis. Residue in the batch stills is a listed hazardous waste (K148), and residue in the crude coal tar storage tanks is also a listed hazardous waste (K147). But both types of materials are exempt from regulation as hazardous wastes when maintained in the stills and tanks.

2. Response to Request Number 2

Materials occasionally received by the Plant in the past for use as raw materials include coal tar oil, water gas tar, crude oil tank bottoms and driveway sealer. In 1992, a quantity of

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waste cooking oil which the Plant was not able to burn in its fluidized bed boiler was used as a raw material. Coal tar pitch is occasionally received by the Plant for direct addition to the Plant's final pitch products. Clean out materials from barges used by AlliedSignal to transport crude coal tar are used by the Plant as a raw material. In 1993 and 1994, the Plant received several shipments of non-hazardous waste water for management in its wastewater treatment system. Documents reflecting recent shipments of all of these materials are set forth in Attachment 2.

3. Response to Request Number 3

Materials referred to in response to Request Number 2 were determined to be non-hazardous either on the basis of process knowledge, analytical information, or both. Responsive documents are set forth in Attachment 2.

4. Response to Request Number 4

Waste materials generated by the Plant and transported off-site for further management over the past several years include the following:

- a. Soil and rock contaminated by a spill of DH oil. These materials are the only hazardous wastes generated by the Plant over the past several years and transported off-site for further management. Documents reflecting a one-time shipment of this material to a hazardous waste landfill in 1992 are included in Attachment 4.
- b. Crushed empty metallic drums once used to store products, raw materials and lubricating oils. Documents reflecting shipments of this material to a non-hazardous waste landfill for the years 1992, 1993 and 1994 are included in Attachment 4.
- c. "Plant waste" consisting of office paper waste, cardboard boxes and other similar wastes. Documents reflecting shipments of this material to a non-hazardous waste landfill are too voluminous to attach to this response and, therefore, are available for inspection by the Agency at the Plant site.
- d. Deteriorated polyurethane foam storage tank insulation. Documents reflecting a one-time shipment of this material to a non-hazardous waste landfill in 1992 are included in Attachment 4.
- e. Asbestos insulation from process equipment and piping. Documents reflecting a one-time shipment of this material to a non-hazardous waste landfill in 1994 are included in Attachment 4.
- f. Used motor oil collected from oil changes of company vehicles.

 Documents reflecting a one-time shipment of this material to Safety-Kleen in 1994 are included in Attachment 4.

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g. Boiler ash generated by the burning of coal and various non-hazardous materials in the Plant's fluidized bed boiler (see response to Request Number 9). Documents reflecting shipments of this material to a non-hazardous waste landfill are too voluminous to attach to this response and are, therefore, available for the Agency's inspection at the Plant site.

5. Response to Request Number 5

All materials identified in Section 4.b -g, above, were determined to be non-hazardous on the basis of the Plant's process knowledge and on the verification of that determination by the off-site vendor handling the material. Documents reflecting the approval of off-site vendors are included in Attachment 4. An analysis of the material identified in Section 4. a, above, is included in Attachment 4.

6. Response to Request Number 6

For the past five years, approximately 60-80 million gallons of crude coal tar has been supplied to the Plant by the following facilities:

- a. National Steel Corp. Ecorse, MI
- b. Detroit Coke Corp. Detroit, MI
- c. Tonawanda Coke Corp. Tonawanda, NY
- d. Bethlehem Steel Corp. Lakawana, NY
- e. Koppers Industries Toledo, OH
- f. DoFasco, Inc. Hamilton, Ont.
- g. Algoma Steel Saulte St. Marie, Ont.
- h. U.S. Steel Gary, IN
- i. AK Steel Middletown, OH

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- j. LTV Steel Warren, OH
- k. Stelco Inc. Nanticoke, Ont.
- Protexa Montcloya, Mexico
- m. Sloss Industries Birmingham, Al
- n. Reilly Industries Cleveland, OH
- o. Inland Steel East Chicago, IN

In their entirety, the documents reflecting shipments of crude coal tar from the facilities noted above for the past five years are too voluminous to attach to this response. Such documents, as well as any analytical information associated with the shipments, are available for the Agency's review at the Plant site. Certain other materials derived from coal are identified in Responses to Request Numbers 2 and 9.

7. Response to Request Number 7

"Baie Comeau Pitch" is a type of solid binder or anode pitch which was produced as one of the Plant's products from approximately 1960 to 1991 for the Canadian Reynolds Metals plant located in Baie Comeau, Quebec. This pitch was produced by the distillation of coal tar by the Tar Distillation unit. The liquid pitch was poured into flat metal bays, where it cooled and was removed by front-end loaders. The solid pitch was then stored for ship transportation to Baie Comeau in piles situated on top of an asphalt pad. The material was loaded onto ships by a belt conveyor fed by front-end loaders.

The piles of Baie Comeau Pitch are no longer present at the Plant. The last shipment to Baie Comeau occurred on or about October 11, 1991. Thereafter, all of the Pitch remaining in the piles was shipped to AlliedSignal's Ironton, Ohio plant. The last shipment to Ironton occurred on or about December 8, 1992. (The Plant does not have the ability to liquefy solid pitch. The Ironton plant has a pitch melting operation. The pitch was melted in the Ironton pitch melter and then shipped as product to Ironton's customers.)

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8. Response to Request Number 8

As discussed in the documents set forth in Attachment 8, the piles referred to in this Request contained coal, coke and crude coal tar materials originating from a barge clean out in 1983. In 1991, the Plant determined that the piles did not exhibit any of the characteristics of a hazardous waste, and, in a letter dated September 16, 1991, the Region and Michigan DNR concurred in this determination. Subsequent to that determination, the Plant burned the material contained in the pile in its fluidized bed boiler until early 1993, when the the contents of the pile were completely consumed.

9. Response to Request Number 9

Until March of 1994, the Plant operated a fluidized bed boiler which used coal as a primary fuel and Number 2 fuel oil as a secondary fuel. Coal burning was occasionally supplemented with materials such as clean-out materials from barges used to transport crude coal tar (see Response to Request Number 8), driveway sealer, solid tar, coal tar pitch, and gel fibers. None of these materials were listed or characteristic hazardous wastes.

The Plant reported for the purposes of EPCRA § 313 that approximately one pound of benzene was burned in the Plant's fluidized bed boiler. As discussed in the documents set forth in Attachment 8, the pile referred to in those documents contained trace amounts of benzene. Using benzene concentration information obtained for the pile, the Plant determined that the total amount of pile material burned in the boiler contained approximately one pound of benzene.

10. Response to Request Number 10

Inasmuch as the regulation of PCBs is outside of the ambit of RCRA, the statutory authority relied upon by the Agency in its request, no response to this request is required. In the spirit of cooperation, however, AlliedSignal notes that the last piece of equipment at the Plant which contained PCBs was removed and properly managed off-site in 1990. The Plant has no information to suggest that activities involving the disposal of PCBs took place at the Plant prior to or after 1990.

11. Response to Request Number 11

There are no underground storage tanks present at the Plant.

12. Response to Request Number 12

As explained in the attached cover letter, this request does not apply to a non-RCRA permitted facility such as the Plant.

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2/2/98

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:

Allied-Signal Inc. 1200 Zug Island Road Detroit, Michigan 48209

Attention: Daryl C. Quinn, Plant Manager

REQUEST FOR INFORMATION PURSUANT TO THE CLEAN AIR ACT

The United States Environmental Protection Agency (U.S. EPA), by

David Kee, Director of the Air and Radiation Division, Region 5, hereby

requires Allied-Signal to submit certain information pursuant to the Clean Air

Act (Act), 42 U.S.C. § 7401 et seq., as amended by the Clean Air Act

Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399. The Administrator of

the U.S. EPA is authorized to require submittal of such information by Section

114(a) of the Act, 42 U.S.C. § 7414(a), as amended by Sections 302 and 702 of

the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399,

2574, and 2680 (to be codified at 42 U.S.C. § 7414(a)) (hereinafter referred

to as Section 114(a)). Authority to require submittal of information pursuant

to Section 114(a) has been delegated to the Director of the Air and Radiation

Division. The information to be submitted in response to this request is

specified in Appendix A.

Allied-Signal is the owner and/or operator of an emission source as specified in Section 114(a) of the Act. The information sought by this request is necessary for U.S. EPA to determine whether Allied-Signal is in compliance with the applicable provisions of the Michigan State Implementation Plan, as approved by the Administrator of U.S. EPA pursuant to Section 110 of

the Act, 42 U.S.C. § 7410, as amended by Section 101 of the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399, 2404.

The information specified in Appendix A must be submitted within 20 calendar days of receipt of this request. All information submitted in response to this request must be certified as true, correct, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Allied-Signal. All required information should be sent to Marietta Newell, Air Toxics and Radiation Branch (AT-18J), Air and Radiation Division, United States Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604. Copies of the required information should also be sent to Rajendra Sinha, Director, Wayne County Air Quality Division, Wayne County Health Department, 640 Temple Street, Suite 700, Detroit, Michigan 48201. Failure to fully comply with the terms of this request for information may subject Allied-Signal to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413, as amended by Section 701 of the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399, 2672, et seq. (to be codified at 42 U.S.C. § 7413) (hereinafter referred to as Section 113).

Pursuant to 40 C.F.R. Part 2, Subpart B, 41 Fed. Reg. 36902 (September 1, 1976) as amended by 43 Fed. Reg. 40000 (September 8, 1978) and 50 Fed. Reg. 51661 (December 18, 1985), Allied-Signal is entitled to assert a claim of business confidentiality regarding any portion of the information submitted in response to this request, except emission data, as defined at 40 C.F.R. § 2.301(a)(2). Failure to assert a claim of business confidentiality renders all submitted information available to the public without further

notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. Part 2, Subpart B. This request is not subject to the Paperwork Reduction Act because it seeks collection of information in an administrative action or investigation involving U.S. EPA and specific individuals or entities.

Any information submitted in response to this request may be used by U.S. EPA in support of an administrative, civil, or criminal action against Allied-Signal. Knowing submittal of false information to U.S. EPA, in response to this request, may be actionable under Section 113(c)(2) of the Act, as well as 18 U.S.C. § 1001, and 18 U.S.C. § 1341.

Any questions concerning this request for information should be directed to Jeffrey Gahris, of my staff, at (312) 886-6794.

2/1/95 Date

David Kee, Director Air and Radiation Division cc: Jerry Avery Michigan Department of Natural Resources

APPENDIX A

The following information must be supplied in accordance with the foregoing Request for Information Pursuant to the Clean Air Act:

For Allied-Signal's coke oven tar processing plant (Detroit Tar Plant) located at 1200 Zug Island Road, Detroit, Michigan, please provide the following:

- Identification and a description of each process unit (including storage tanks and the substances stored in them), date that original construction commenced, and date of initial start up. Provide plant layout and flow diagrams sufficient to illustrate the process.
- Normal and maximum hours of operation per year, for each process unit.
 Indicate whether it is operated in a batch or continuous mode. Indicate whether any units are currently not in operation. If not operating, indicate shutdown date and date of re-start, if anticipated.
- 3. Maximum design and normal actual hourly throughput capacity for each process unit. For storage tanks, indicate design storage capacity.
- 4. Type of air pollutants generated by each process unit identified above, including constituents known to cause odors and/or opacity.
- 5. Description of emission control devices associated with each process unit, if any, including the manufacturer's name, the pollutant(s) that each device is designed to control, and the associated design specification for control efficiency.
- 6. Known or estimated capture and control efficiencies of each emission control device (state how they were determined and submit the most recent stack tests and calculations used to make such determinations for the process unit in question). Document the operating rates, control device parameters, and type of materials used during the tests. Indicate reference test method used.
- 7. Identification of process unit parameters monitored and recorded for the unit. Indicate frequency of observations for each parameter monitored, the nature of variation in the parameters under normal operating conditions, and their range in values over the last three months.
- 8. Description of operating practices that are used to minimize emissions from the process units. Identify process and emission control device operating parameters that are routinely monitored, and their range in values over the last three months.
- 9. Copies of current air emission operating permits, and construction permits issued to the Detroit Tar Plant by state or local air pollution control authorities for new process units or process unit modifications. If any process units are operating without such permits, provide an explanation for each such unit.

- 10. Indication of the sources of the coke oven tars or other materials processed at the Detroit Tar Plant. Provide any documents pertaining to the testing of the tars or other materials, which are currently being processed, for hazardous or toxic constituents.
- 11. Diagrams of smoke stacks, showing ductwork, breeching, and flue arrangements, including bypass equipment. Also, submit diagrams that locate process vents or pressure relief valves that may cause emissions.
- 12. Description of sources of fugitive emissions of gaseous pollutants, including sources such as pumps, valves, storage tanks, and flanges. Indicate what specific compounds (including benzene) which are known to be emitted as fugitives, and the nature of Allied-Signal's program to minimize such emissions. Provide any available estimates of the magnitude of such emissions.
- 13. Identification of fuels used in boilers or other combustion equipment, and the sources of those fuels.
- 14. Description of measures taken to minimize the presence of objectionable odors from plant processes. Describe the frequency and nature of complaints received from the public during the last 6 months.
- 15. Copy of the malfunction and abatement plan for the Detroit Tar Plant. Indicate the nature, frequency, and duration of any malfunctions that occurred within the last year, including control equipment bypasses, and measures taken to correct them.
- 16. Description of measures used to control fugitive dust emissions from paved and unpaved roadways and parking lots, or other sources. Identify products used as dust suppressants.

CERTIFICATE OF SERVICE

I, Beverly Short, do hereby certify that a Request For
Information Pursuant to the Clean Air Act was sent by Certified Mail, Return
Receipt Requested, to:

Daryl C. Quinn, Plant Manager Allied-Signal Inc. 1200 Zug Island Road Detroit, Michigan 48209

Certified Mail Number: P 188 577 '196

I certify that copies of the Request for Information pursuant to the Clean Air Act were sent by first class mail to:

Rajendra Sinha, Director Wayne County Air Pollution Control Division Wayne County Health Department 640 Temple Street, Suite 700 Detroit, Michigan 48201

Barbara J. Rosenbaum, Chief Air Quality Division Michigan Department of Natural Resources Town Center Suite B, #200 333 South Capitol Lansing, Michigan 48933

Date 2, 1995

Beverly Short, Secretary

Enforcement Section

Air Toxics and Radiation Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

F5 0 2 1995

HRE-8J

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Daryl Quinn
Plant Manager
Allied Signal, Incorporated
Detroit Tar Plant
1200 Zug Road
Detroit, Michigan 48209

Re: RCRA §3007 Information Request

Allied Signal, Detroit Tar Plant

Detroit, Michigan MID 005 516 198

Dear Sir/Madam:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The information requested relates to Allied Signal's facility in Detroit, Michigan.

The information requested herein must be provided to this office within the timeframe specified in the request, notwithstanding its possible characterization as confidential information. You may, pursuant to 40 CFR §2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR §2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice

Written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying, pursuant to 40 CFR §270.11, that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Any documents submitted to the U.S. EPA, Region 5, pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge or belief.

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Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

If you have any questions regarding this matter, please contact Mr. Michael Cunningham, RCRA Enforcement Branch, at (312) 886-4464. Your response should be sent to the United States Environmental Protection Agency, Region 5, RCRA Enforcement Branch (HRE-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Michael Cunningham.

Sincerely yours,

Joseph M. Boyle, Chief RCRA Enforcement Branch

Enclosure

cc: Tim Sonnenberg, MDNR

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bcc: Padmavati Klejwa, CM-29A

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1/31/95

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

ATTER GEOMAT THOORRONDED	\ TNEODMANTON DEOLIGEN DIDCHAME
ALLIED SIGNAL, INCORPORATED) INFORMATION REQUEST PURSUANT
DETROIT TAR PLANT) TO SECTION 3007 OF THE
1200 ZUG ISLAND ROAD) RESOURCE CONSERVATION AND
DETROIT, MICHIGAN 48209) RECOVERY ACT, AS AMENDED,
) 42 U.S.C. §6927
EPA ID NO.: MID 005 516 198)

This is a request by the United States Environmental Protection Agency (U.S. EPA) issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The issuance of this request serves to require Allied Signal, Incorporated to submit information relating to the generation, storage, treatment, disposal, and/or recycling of solid and/or hazardous waste at the Allied Signal, Detroit Tar Plant located in Detroit, Michigan, as defined by Michigan Administrative Code, Part 1 and 40 CFR Part 261.

The State of Michigan is authorized to administer and enforce a hazardous waste management program in lieu of the Federal program under Subtitle C of RCRA, 42 U.S.C. §6921 et. seq., subject to the Hazardous and Solid Waste Amendments of 1984 (HSWA), November 8, 1984, 42 U.S.C. §6926(c) and (g). The State's program, as administered by the Michigan Department of Natural Resources, was approved by U.S. EPA pursuant to 42 U.S.C. §6926(b) and 40 CFR Part 271. U.S. EPA's approvals were effective on October 30, 1986, January 23, 1990, and June 24, 1991 (see 51 Fed. Reg. 36804, 54 Fed. Reg. 46808, and 56 Fed. Reg. 18517). Michigan is authorized to implement only the HSWA requirements identified in

the June 24, 1991, Federal Register notice granting Michigan authorization (see 56 Fed. Reg. 18517). Michigan has primary responsibility for enforcing its hazardous waste program. However, U.S. EPA retains the authority to exercise its enforcement authorities under Sections 3007, 3008, 3013, and 7003 of RCRA, 42 U.S.C. §§6927, 6928, 6934, and 6973, as well as under other Federal laws and regulations.

I. INSTRUCTIONS

This request for information pertains to any and all information you may have regarding the generation, treatment, storage, disposal and/or recycling of solid and/or hazardous waste at the Allied Signal, Detroit Tar Plant located at 1200 Zug Island Road, Detroit, Michigan 48209 ("Allied").

If any information called for herein is not available or accessible in the full detail requested, the request shall be deemed to call for the best information available. The request also requires the production of all information called for in as detailed a manner as possible based upon such information as is available or accessible.

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets.

You are entitled to assert a claim of confidentiality pursuant to 40 CFR §2.203(b) for any information produced that, if disclosed

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to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. A request for confidential treatment must be made when information is provided since any information not so identified will not be accorded this protection by the Agency.

The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true, accurate, and complete to the best of the signatory's knowledge and belief. Should the signatory find at any time after submittal of the requested information that any portion of this submittal certified as true is false or misleading, the signatory should so notify U.S. EPA. If any information submitted under this information request is found by U.S. EPA to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

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The information requested herein must be provided, within twenty (20) days following receipt of this request, to the United States Environmental Protection Agency, Region 5, Attention: Mr. Michael Cunningham, RCRA Enforcement Branch (HRE-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

This Information Request is not subject to the Paperwork Reduction Act, <u>See</u> 44 U.S.C. Sections 3518(c)(1)(A) and (B).

II. <u>DEFINITIONS</u>

- A. "Disposal" means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters, as defined in Mich. Admin. Code r. 299.9102 and 40 CFR §260.10.
- B. "Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them), as defined in Mich. Admin. Code r. 299.9103 and 40 CFR §260.10.

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- C. "Generator" means any person, by site, whose act or process produces hazardous waste identified or listed in 40 CFR §§261.10 through 261.33 or whose act first causes a hazardous waste to become subject to regulation, as defined in Mich. Admin. Code r. 299.9104 and 40 CFR §260.10.
- D. "Hazardous waste" means a hazardous waste as defined in Mich. Admin. Code r. 299.9104 and r. 299.9203 and 40 CFR §§261.3 and 260.10.
- E. "Management" means the systematic control of the collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of hazardous waste, as defined in Mich. Admin. Code r. 299.9105 and 40 CFR §260.10.
- F. "Recycle" means use, reuse, or reclamation as defined in Mich. Admin. Code r. 299.9107. Material is "used" or "reused" if it is either of the following:
 - i) Employed as an ingredient in an industrial process to make a product, unless distinct components of the material are recovered as separate end products, such as when metals are recovered from metal-containing secondary materials.
 - ii) Employed in a particular function or application as an effective substitute for a commercial product, such as spent pickle liquor used as phosphorus precipitant and sludge conditioner in wastewater treatment.

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- "Solid Waste" means any garbage, refuse, sludge from a waste G. treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from the industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §1342, or source, special nuclear, or byproduct material as defined by the Atomic Energy Act of 1954, as amended, 42 U.S.C. §2011 et. seq., as defined in Section 1004 of the Solid Waste Disposal Act, as amended.
- H. "Storage" means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere, as defined in Mich. Admin. Code r. 299.9107 and 40 CFR §260.10.
- I. "Treatment" means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character, or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as

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to render such waste nonhazardous or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume, as defined in Mich. Admin. Code r. 299.9108 and 40 CFR §260.10.

- J. "You" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assignees, and agents.
- K. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, Mich. Admin. Code r. Parts 1 through 11, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

III. Request for Answers to Questions and the Production of Documents

1. Provide a detailed description of each manufacturing process carried out at Allied since November 19, 1980. Include the process for the manufacture of creosote and any processes producing dibenzofurans. Identify the raw materials used, the steps in the manufacturing process, the final products, and all solid and/or hazardous wastes generated from the processes.

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- 2. Provide a description of all solid and/or hazardous waste received by Allied since November 19, 1980. Describe any treatment, storage and/or disposal activities conducted on this waste as well as any recycling, reuse, or reclamation which took place. Describe the ultimate destination of each waste. If the material is/was shipped off-site, include manifests, bills of lading, trip logs, etc.
- 3. For all wastes identified in the answer to question number two (2) above, describe how Allied determined if the solid waste was or was not a hazardous waste pursuant to specific procedures identified at 40 CFR §262.11. Include copies of any analyses used in making such a determination.
- 4. Provide a description of all solid and hazardous waste generated at Allied since November 19, 1980. Describe the process(es) which generate or generated each waste stream. Describe any treatment, storage, and/or disposal activities carried out on each waste, as well as the ultimate destination of each waste. If the material is/was shipped off-site, include manifests, bills of lading, trip logs, etc.
- 5. For all wastes identified in the answer to question number four (4) above, describe how Allied determined if the solid waste was or was not a hazardous waste pursuant to specific

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procedures identified at 40 CFR §262.11. Include copies of any analyses used in making such a determination.

- from coal during the past five (5) years which was used in your manufacturing processes. Provide the name, address, the process from which the material was generated, and shipping documents describing the material being sent (including manifests, bills of lading, trip logs, etc.). Also, provide the results of all analyses conducted by and/or provided to Allied on such coal material over the last five (5) years.
- 7. Describe the process which generated the Baie Comeau Pitch which was being stored in piles at Allied on July 30, 1992. Provide a detailed description of all materials used in its manufacture, including their origin. Also, provide the date on which the pile was first created. If the pile is no longer present at Allied, explain the method of its disposal.
- 8. Identify the origin of all materials stored in piles at Allied on July 30, 1992, which contained material generated from the cleaning of barges and is/was being burned in the fluid bed boiler. Include a description of the processes which generated these materials prior to their placement in the barges, and the results of any analyses done on them.

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Also, provide the results of all analyses of the pile(s), and the date on which materials were first placed on the pile(s).

- 9. Identify all materials, including all solid and/or hazardous wastes, that are burned for energy recovery. Describe how Allied determined that one (1) pound of benzene was burned on-site for energy recovery in calendar year 1993.
- 10. Describe any activities involving the disposal of polychlorinated biphenyls (PCBs) which have or will take place at Allied, including disposal in a landfill not licensed pursuant to the Toxic Substance Control Act, 50 U.S.C. §2601 et. seg. Include the quantities (by weight) of PCBs.
- 11. Provide a description of all underground storage tanks at Allied, including the location, current contents, storage capacity, and date when any material was first stored in each tank.
- 12. Provide the following notarized certification by a responsible corporate officer or by a duly authorized representative of that person:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who

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manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Issued this ______, day of ______, 1995.

Joseph M. Boyle, Chief RCRA Enforcement Branch Waste Management Division

United States Environmental Protection Agency

Region 5

OFFICIAL FILE COPY

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INFORMATION REQUEST RCRA ENFORCEMENT BRANCH APPROVAL (Delegation 8-8)

AUTHORITY: RCRA §3007 only RCRA §3007 and CERCLA §104
INSTALLATION NAME: Allied Signal, Inc.
LOCATION ADDRESS: 1200 Zug Island Road
CITY: Detroit
STATE: MI ZIP: 48209
REGISTERED AGENT:
IS THE MATTER IN RCRA LITIGATION OR UNDER A COURT ORDER? NO YES (Concurrence by Regional Counsel is required).
A. DRAFT INITIALS DATE
1. REB Staff Name Michael Cunningham 12395 SECTION: IL/IN MI/WI OH/MN LL/MI/WI IN/OH/MN
2. REB Section Chief 1/36/95
3. ORC Attorney Name Padmavati Klejwa (Only if the matter is in RCRA Litigation or under court order)
B. FINAL
1. REB Staff / 1/26/25
2. REB Section Chief 1/26/85
3. ORC Attorney (For Litigation Consultation only)
4. REB Chief 195
5. Assoc. Director, Office of RCRA (only if CERCLA §104 authority is referenced)
6. WMD Director (only if CERCLA §104 authority is referenced)

INFORMATION REQUEST RCRA ENFORCEMENT BRANCH APPE

P 243 556 844

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

(Delegation 8-8)	0-794	Daryl Quinn
AUTHORITY: RCRA \$3007 only RCRA \$3	1985-48	Street and No. 1200 Zug Road
INSTALLATION NAME: Allied Signal, Inc.	S.G.P.O.	Detroit, Michigan48209
LOCATION ADDRESS: 1200 Zug Island Road	* U.S.	Certified Fee
CITY: Detroit		Special Delivery Fee
	Б 1 8	Restricted Delivery Fee
STATE: MI ZIP: 48209	HR	Return Receipt showing to whom and Date Delivered
REGISTERED AGENT:	1985	Return Receipt showing to whom. Date, and Address of Delivery CAGO
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1. REB Staff Name Michael Cunningham SECTION:	TE	5#2-
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2. REB Section Chief	18	1/36/93
3. ORC Attorney Name Padmavati Klejwa (Only if the matter is in RCRA Litigati or under court order)	on	1-25-95
B. FINAL	,	
1. REB Staff	R	1/26/25
2. REB Section Chief	F	1/26/95
3. ORC Attorney (For Litigation Consultation only)	7	_
4. REB Chief	MF	3 1/21/85
5. Assoc. Director, Office of RCRA (only if CERCLA §104 authority is referenced)		- \
6. WMD Director (only if CERCLA §104 authority is referenced)	1	
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AUG 3 1992

ENSR Consulting
and Engineering
35 Nagog Park
Acton, Massachusetts 01720
(508) 635-9500
(508) 635-9180 (FAX)

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

July 29, 1992

ENSR Ref. No: 0805-006 ENSR Doc. No: SJP0789

Ms. Gertrude Matuschkovitz U.S. EPA Region 5 77 West Jackson Street Chicago, IL 60604

Re:

Notification in Accordance With The Off-site Policy, Lot 19 Grove Street Site,

Brockton, MA

Dear Ms. Matuschkovitz:

This letter is to confirm your voice-mail message of July 24, 1992. Your message stated that an EPA inspection will be performed at the Allied Signal facility in Detroit, Michigan and will be completed by the end of July. The purpose of this inspection is to evaluate the compliance status of the Allied facility. Based on the results of this evaluation, EPA will inform ENSR whether or not the Allied Facility in Detroit is considered acceptable to receive CERCLA wastes in accordance with EPA's Off-Site Policy and in adherence to Section 121(d)(3) of SARA.

As discussed during our telephone conversation of July 22, 1992, the Aliied facility does not appear on EPA's list of treatment, storage, and disposal facilities (TSD) because the Detroit Allied facility receives hazardous waste for recycling only, and is therefore exempt from the RCRA requirement for TSD facilities. However we understand that, in accordance with the EPA Off-Site Policy, and in order to receive CERCLA waste, an inspection of the facility by EPA must be performed within the last six months prior to receipt of the CERCLA waste. Completion of the above referenced inspection will therefore satisfy the requirements of the Off-site Policy.

A removal action is being performed at the above referenced site located in Brockton, Massachusetts. Removal action activities include removal and disposal of coal tar material. Removal and disposal of the coal tar material is scheduled to occur between August 3 and September 30, 1992. The Allied facility in Detroit, Michigan has been selected as the disposal facility for this project if recycling of the coal tar is selected as the disposal option.

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Ms. Gertrude Matuschkovitz July 29, 1992 Page 2

ENSR appreciates your attentiveness to this situation and the expediency with which you have scheduled the facility inspection. If you have any questions or require additional information please do not hesitate to call me at (508) 635-9500.

Sincerely,

Scott J. Perry Geologist

CC:

Arthur Wing/EPA OSC

Paul LaShoto/Bay State Gas

William Duvel/ENSR

MEMORANDUM WAYNE COUNTY HEALTH DEPARTMENT Air Pollution Control Division

TO:

Filo

FROM:

J. E. DaRocha, Air Pollution Inspector

DATE:

September 25, 1991

SUBJECT:

Annual Compliance Inspection at Allied Signal

Detroit Tar Plant, 1200 Zug Island Road,

Detroit, Michigan 48209

Inspection dates:

September 5, 1991

September 12, 1991

INTRODUCTION

While at the plant, I was accompanied by Messrs. Daryl Quincy, Plant Manager, Greg Migaki, Superintendent of Operations and Rudolf Dawson, Supervisor of Environmental Engineering.

This facility processes coke oven crude coal tars into pitch, roofing tars, and other usable by-products. The process involves heating the tars in a tar heater to the boiling point which enables the various components to be separated by cooling and condensation.

PROCESS DESCRIPTION

The crude coal tars are continually distilled in a two-system flash-distillation process. The first system, dehydration (DH), is used to remove entrained water in crude tar as the crude tar is pumped from storage to the distillation column through a series of heat exchangers. At the distillation column (dehydration) the tar is heated and passed through a flash chamber where it is separated into DH oil, DH water and dry tar. The dry tar is then passed into flashing chambers where oils are separated from the liquid pitch product. These oils are then further separated into carbolic oil, light creosote oil, heavy creosote and pitch. The pitch, which is 99% carbon, is cooled to below 450° F. in a recirculating water tube cooler. After cooling to below 450° F., the pitch is pumped to open air pitch bays where it can cool further, solidify and harden.

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Annual Compliance Inspection at Allied Signal Detroit Tar Plant, 1200 Zug Island Road Detroit, Michigan 48209
Page 2

The pitch, when hard, is removed from the pitch bay by manual and mechanical means using a small front end loader.

The various molecular weight/volatility tars are stored in storage tanks. When the tars are being pumped to and from the storage, a Venturi Wet Scrubber is used to clean the purge air and condense vapors prior to venting the tanks.

EQUIPMENT AND CONTROL SYSTEMS

- * Creosote oil fired steam boiler with wet scrubber
- * Tar heater furnace fired with creosote oil with wet scrubber
- * Coal tar pitch fuel collector system from tank cars and trucks using wet venturi and scrubber gas-water separator
- * VOC control system in pitch bay storage system
- * Pitch bay 14, 15, 16, 16, 17, 19 and 20
- * Barrel loading dock
- * Tar still (not in service)
- * Tar still (in service)
- * Installation of resource recovery fluidized boiler fueled by using excess product with cyclone and baghouse controls
- * Fugitive Dust Program negotiated WCAPCD and implemented through State Rule 373. The program consists of watering storage piles and sweeping paved roads weekly. (A copy of the route map is attached).

DISCUSSION

Due to a concern over the accuracy of existing Certificates of Operation (C of O), a thorough, indepth study ensued. Every C of O was incorrect to some degree. All C of O's were rewritten with the correct information added as necessary. Appendix A lists the corrected C of O's:

The company received an extension to the original trial operating period for the fluidized bed boiler on March 1, 1989. The approval allowed the trial operation to be extended through May 29, 1989. The fluidized bed boiler stack test was performed on April 19 and 20, 1989. A copy of the Letter of Extension and correspondence regarding the stack test results are included in Appendix D of this report. The stack showed that the fluidized bed boiler is not in compliance with sulfur dioxide emissions, per permit conditions. The company is pursuing several options by which it can reduce the sulfur dioxide emissions being emitted by the boiler. The facility is required to comply with the following Wayne County Ordinance Regulations:

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Annual Compliance Inspection at Allied Signal Detroit Tar Plant, 1200 Zug Island Road Detroit, Michigan 48209
Page 3

County Ordinance: Sec. 501 A Inc., State Rule 301

Visible Emissions, 20% Opacity Limitation

Sec. 601, Emission Limitations and Prohibitions Sulfur Bearing Compounds

(Table 6-1)

Sec. 801 A Inc., State Rule 901 B Air Contaminants - Health Nuisance

Copies of three Installation Permit Applications are attached.

1. Mixer/Briquetter C-7602

2. Hammermill Crusher C-7626

3. Wastewater Treatment Facility C-8906

Only one Notice of Violation (NOV) was issued in 1991, which related to excess opacity of the fluidized bed boiler. A copy is attached.

CONCLUSION

All storage tanks were in good condition with the accompanying vapor condensors operational. The York Shipley Boiler was shut down and on standby while the fluidized bed boiler was in service.

The facility has been operated in compliance except for the above exclusion. The company will be submitting a program for sulfur dioxide emission reduction.

J. E. DaRocha/bb

attachments

cc: R. Zabick - Enforcement Supervisor

M. Maillard - Enforcement Director

I. Komanahalli - Engineer

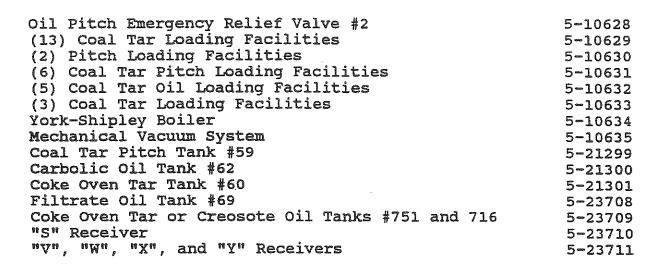
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APPENDIX A

	APC NO.
Tar heater and burner	5-10577
Tar stills and burner # 1, 3 and 4	5-10578
No. 2 Tar still - #629	5-10579
Oil storage tanks #70 and 717	5-10580
Creosote oil tank #1220	5-10581
Creosote oil tanks #719, 720, 721, 722 and 723	5-10582
Tar tank #52	5-10583
Tar tanks #53 and 54	5-10584
Coal tar pitch tank #75	5-10585
Creosote oil tank #718	5-10586
Coke oven tar or creosote oil tank #66	5-10587
	5-10588
Creosote oil tank #65	5-10589
Coal tar pitch tank #57	5-10590
Creosote oil or oil pitch tanks #834 and 835	5-10591
Coke oven tar tank #51	5-10592
Water gas tar tank #68	5-10593
Special oil tank #715	5-10594
"E" Receiver creosote oil tank	5-10595
Coal tar oil tanks #73-A and 81	5-10597
Creosote oil tank #77	5-10598
"R" Receiver Dehydrated Oil	5-10599
Hard Pitch Bay #17	5-10600
Hard Pitch Bay #19	5-10601
Soft Pitch Barrel Loading	5-10602
Hard Pitch Barreling Dock	5-10603
Hard Pitch Bay #16	5-10604
Pitch Bay #20	5-10605
Coal Tar Pitch Blow Tanks #1, 2 and 3	5-10606
Coal Tar Pitch Tank #78	5-10607
Hard Pitch Bay #15	5-10608
Hard Pitch Bay #14	5-10609
Coke oven Tar Tank #544	5-10610
Caustic Soda Tank #71	5-10611
Coke Oven Tar Tank-#56	5-10612
Creosote Oil Tank #58	5-10613
Coal Tar Pitch Tank #50	5-10614
Coal Tar Pitch Tank #59/Coke Oven Tar Tank #60	5-10615
Contaminated Water Treatment Tank #ST-1 and ST-2	5-10616
Light Carbolic Oil Residue Treatment Tank #ST-3	5-10617
Caustic Tank #ST-4	5-10618
Coal Tar Tank #83	5-10619
Hi Flash Receivers #3 and 4	5-10620
Creosote Blend Tank #63/#2 Fuel Oil Tank #64	5-10621
Soft Pitch Tank #73	5-10622
Refined Tar Tank #74	5-10623
Tar Heater Vent	5-10624
(3) Tar Heater Relief Valves	5-10625

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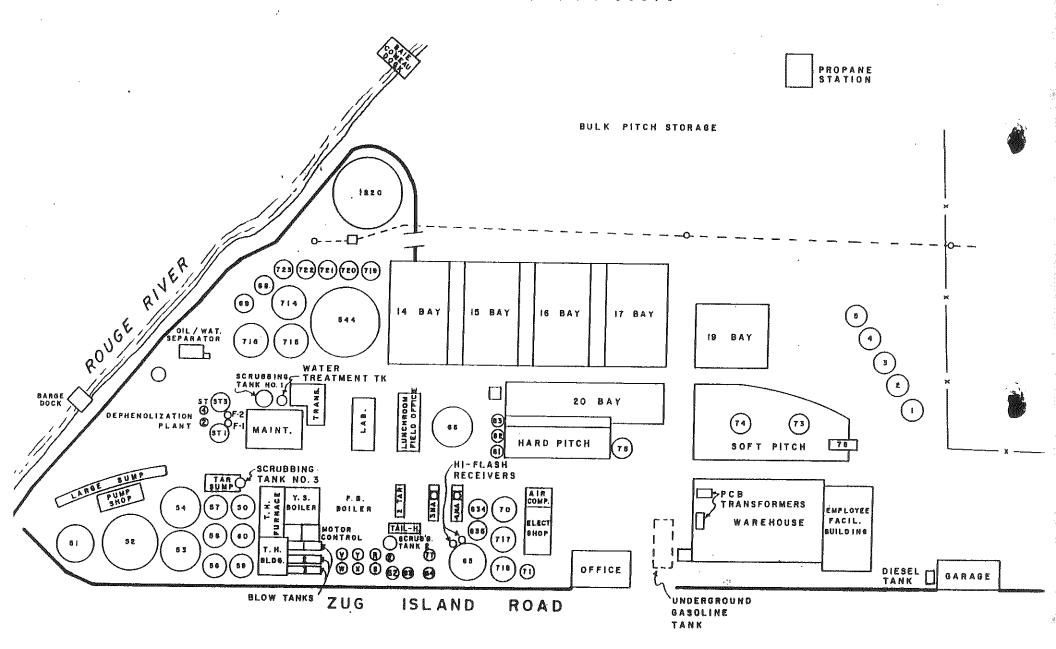
cc: M. Maillard

R. Zabick

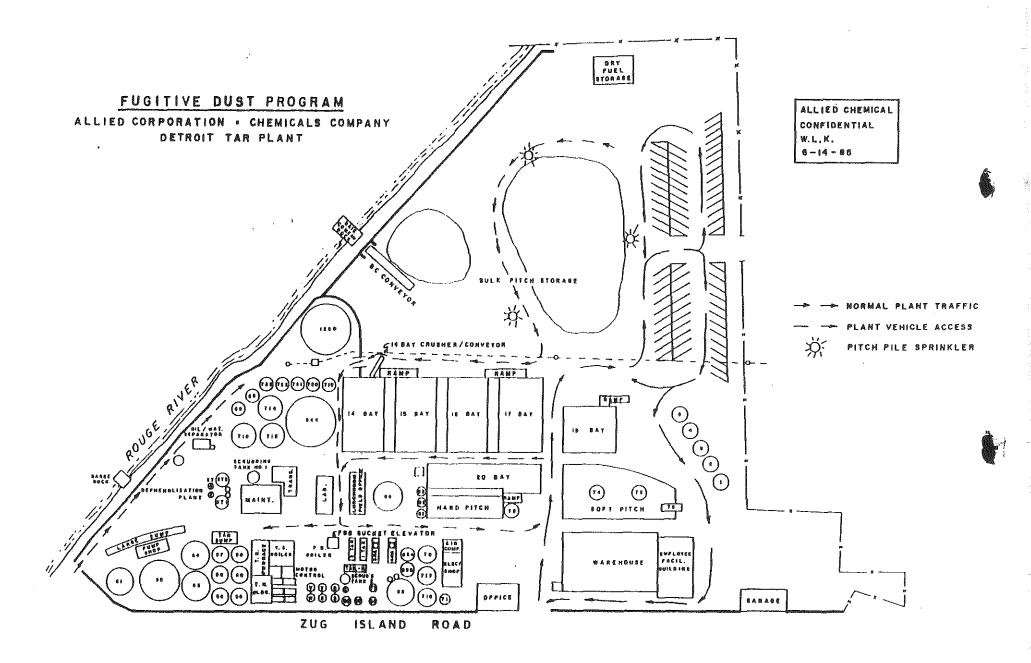
I. Konanahalli

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ALLIED CHEMICAL SECTOR DETROIT TAR PRODUCTS

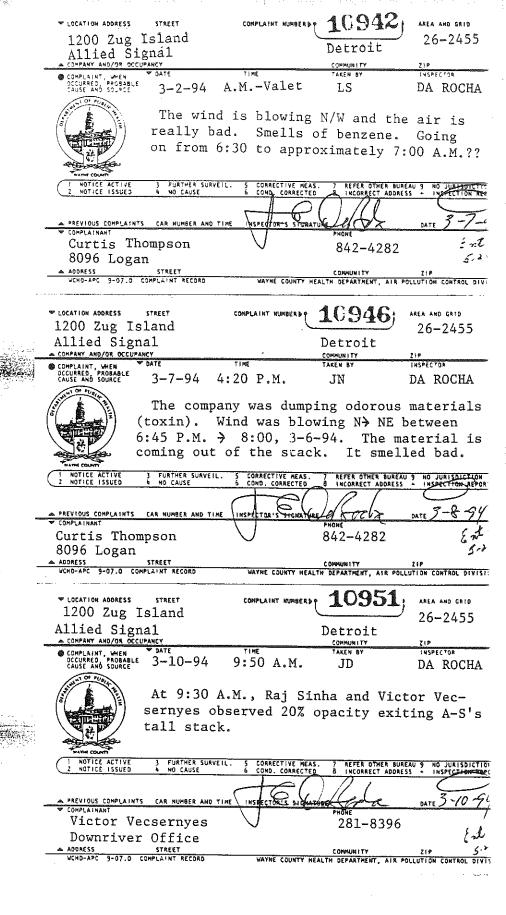


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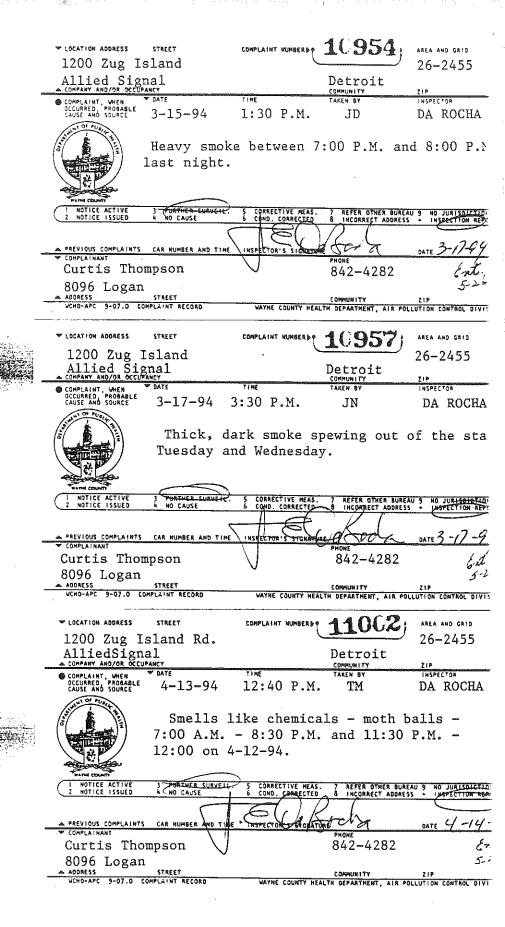


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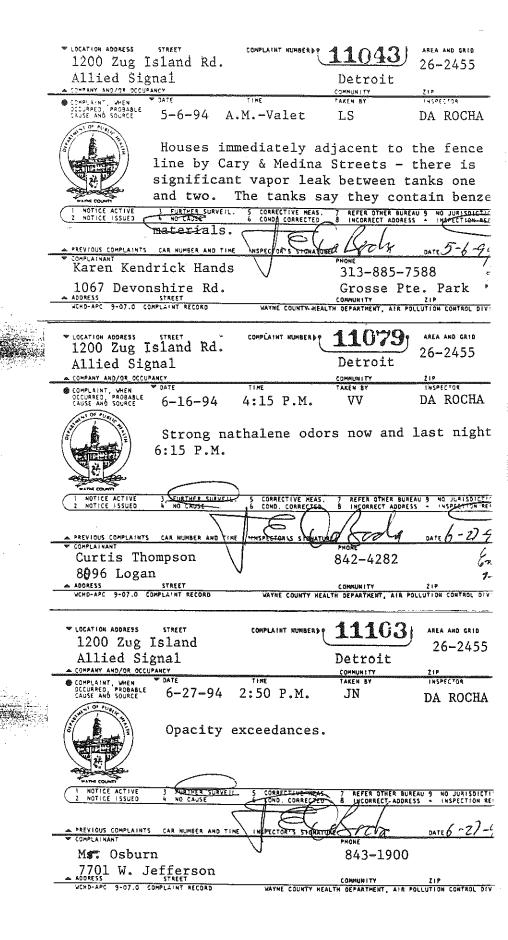
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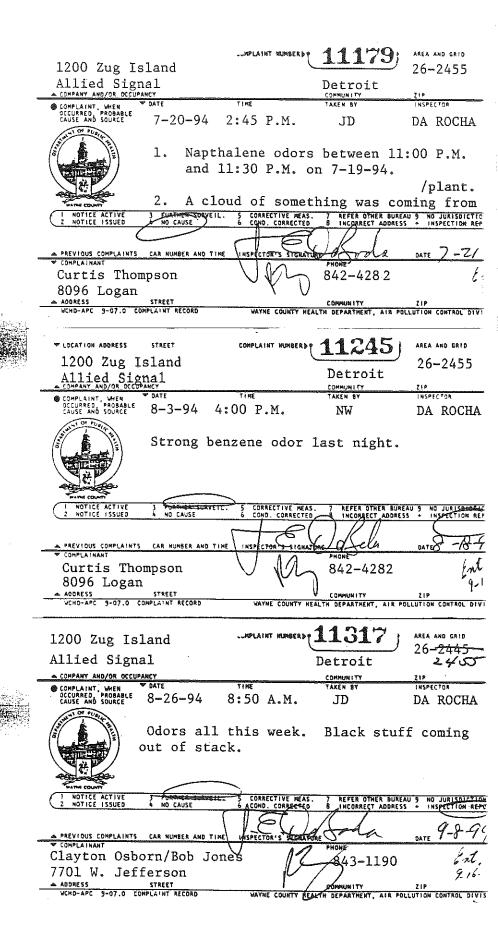
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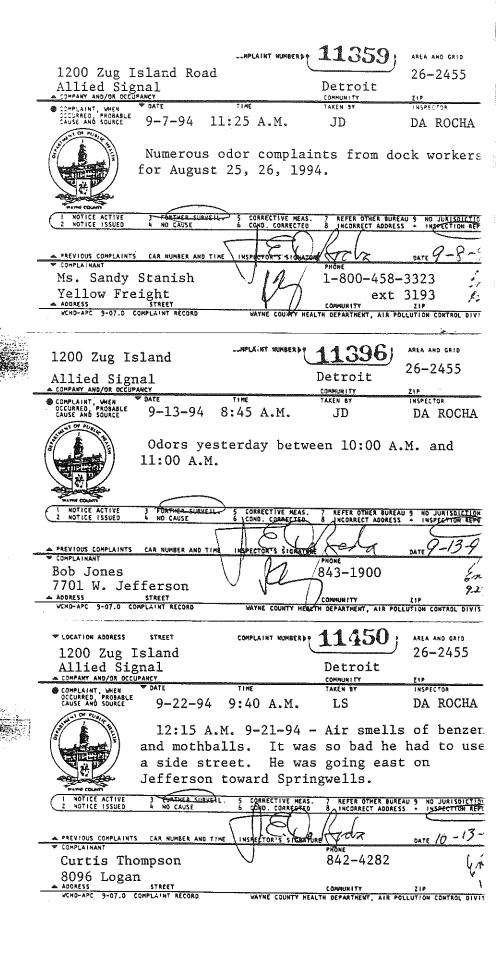
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LOCATION ADDRESS		ARE	
120	Zug Island Road		6 2 4 5 5 0 3 6 7 9 4
COMPANY ANDIOR OWNER	Allied Signal.		OCCUPANCY The Management of th
RESPONSIBLE PERSON	Daryl Quinn 842-4400 1200 Zug Island Road, Det, Mic		Plant Manager Fax 842-2804
ADDRESS APPARENT	Rudy Dawson, Supervisor Enviro	nmental Engineer	ring
SOURCE AND/OR PROBABLE		- The Control of the	INSPECTOR DA ROCHA
CAUSE			
VIOLATICN CODE	DAYS OR DATE TO COMPLY	SOURCE CODE	INSPECTION REPORT
	While attenting to con	text Mr. Ru	by Dowson I absent
	en grait courie for	what time on	1' be Batch Still # 4".
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	2 Mr. Downson was not en	rulelele Josh	with Mr. Jeff Siedok.
	Hunhit lit at 1:	notice a new	to the to the state of the
	3 Sparanth Mr. G	ndon Cali	Pract English the containt
	Mr Siadoks stelm	to-waking 1	Sup at
	(y) Debugging should	d be caretited	at the end of this week
	(+ riday ?).		
	5) Mr- Sawson to un		scourting the institution,
	(6) Sint I work out	soil orloss	will be istand
	(b) Have (1 with an run	Jus 141	Retin
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WAYNE COUNTY DEPARTMENT OF HEALTH Air Pollution Control Division VISIBLE EMISSION OR ODOR EVALUATION FORM

Date: 3-7-94			Name:		A	Allied-Segnal 1200 Zug Johns				·
Observer: Da Rock			Addı	ess:_	12	00 Zue	Tol	med_		
Observation: Bath Still #	+ 4				45	1	0	15	30	45
· · · · · · · · · · · · · · · · · · ·		100	100	100	100	30				
Stack — Distance From: 800	1			100	. 1	31				
— Height <u>70</u>	2		T	100	1	32				
Wind — Speed <u>3-5</u>	3	1	1	100		33				
— Direction w/sw	4	1	1	100		34				
Sky Condition Project	5	100	100	100	100	. 35				
Color of Emission blook	6					36				
Plume Character Ootter	7					37				
- Fuel Crosali	8					38				
— Began <u> ५:०० 🎮 .</u>	9					39				
— Ended 4.06 /M	10					40				
Sketch:	11					41				
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♦ Source	13					43				
ļ	14					44				
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Observer	16					46				
	17					47				
	18					48				
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	20					50				
Sun	21		<u> </u>			51				
Odor	22		<u> </u>			52				
Description	23					53				
	24					54				
Remarks: Observation Lange	25					55				
ille sutt 18. 10.	26				<u> </u>	56				
L. Clear C	27	<u> </u>				57				
<u>V</u>	28					58				
	29					59				
	Obser	ver's	Signa	ture:		6 (1)		

APC-89 Rev 5-87

Detroit, MI 48209



March 29, 1994

Mr. Robert Zabick Enforcement Officer Wayne County Air Pollution Control Division 640 Temple, Suite 700 Detroit, Mi 48401

Re: Quarterly Excess Opacity Report, 1st. Quarter

Dear Mr. Zabick,

Please find enclosed the Quarterly Excess Opacity Report for the first quarter of 1994 for the Detroit Tar Plant. It should be noted, that this report will show only the exceedences for opacity and So2. Detailed information is available for inspection by Wayne County Air Pollution.

The limitation based on permit No. C-6291 for So2 is 282 ppm of wet flue gas, corrected to 50% excess air, on a three hour running average. The limitation for visible emissions is 10% opacity, based on a six minute running average time.

As evidenced, by the attached reports of exceedence, we were out of compliance 0.0% for the month of January 1994, 0.0% for the month of February 1994, and 0.0% for the month of March 1994 for So2 emissions. For visible emissions, we were out of compliance 0.94% for the month of January 1994, 2.17% for the month of February 1994, and 0.0% for the month of March 1994.

Any question regarding this information should be directed to Rudolph Dawson, Environmental and IH supervisor, at 842 - 5480.

Sincerely

Rudolph Dawson

Environmental and IH Supervisor

c: Finn Bohn - MTO
 Daryl Quinn
 Robert O'Brien

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AlliedSignal, Inc. Detroit Tar Plant Monthly Report for January 1994 Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
01/06/94	2:00 a.m.	6 min.	12.0%	Baghouse plugged
01/06/94	6:00 a.m.	90 min.	12.0%	Bad Bags in Baghouse
01/14/94	5:30 p.m.	6 min.	12.0%	Fuel Problems
01/15/94	2:00 a.m.	24 min.	12-28%	Fuel Problems Fuel Problems
01/15/94	10:00 a.m.	30 min.	11-16%	
01/16/94	12:00 a.m.	6 min.	13.0%	Bad Bags in Baghouse
01/16/94	12:06 a.m.	462 min.	12-30%	Bad Bags in Baghouse

So2 EXCEEDENCE

DATE TIME DURATION OPACITY REASON

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.

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AlliedSignal, Inc.
Detroit Tar Plant
Monthly Report for February 1994
Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
02/05/94	10:00 p.m.	120 min.	10-20%	Bad Bags in Baghouse
02/06/94	12:00 a.m.	600 min.	10-20%	Bad Bags in Baghouse
02/08/94	3:30 p.m.	6 min.	36.0%	North Downport plugged
02/08/94	3:36 a.m.	6 min.	34.0%	North Downport plugged
02/08/94	3:42 a.m.	6 min.	12.0%	North Downport plugged
02/08/94	10:06 p.m.	24 min.	12-35%	North Downport plugged
02/08/94	11:30 p.m.	12 min.	12-13%	North Downport plugged
02/09/94	1:12 a.m.	24 min.	13-20%	North Downport plugged
02/09/94	2:30 a.m.	6 min.	22.0%	South Downport plugged
02/17/94	11:30 p.m.	30 min.	22-40%	Residual ash from baghouse changeout.
02/17/94	5:45 a.m.	42 min.	12-40%	FBB was on preheat burners only No opacity during this time.

So2 EXCEEDENCE

DATE	TIME	DURATION	ODACITY	DEAGON
DAIL	IIIAI	DOHATION	OPACITY	REASON

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.

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AlliedSignal, Inc.
Detroit Tar Plant
Monthly Report for March 1994
Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE

TIME

DURATION OPACITY

REASON

THERE WERE NO OPACITY EXCEEDENCES TO REPORT FOR THE MONTH.

So2 EXCEEDENCE

DATE

TIME

DURATION OPACITY

REASON

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.

THE FBB WAS SHUTDOWN ON MARCH 18, 1994 AND WILL BE DOWN UNTIL FURTHUR NOTICE.

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1 2 0	Zug Island Road AREA GRID DATE VIOLATION 2 6 2 4 5 5 0 5 / 3 9 4
COMPAR AND/OR OWN! RESPONSIB PERSO	Daryl Quinn 842-4400 TITLE Plant Manager 1200 Zug Island Road, Det, Michigan 48209 Fax 842-2804
APPARE SOURI AND4 PROBAB CAU	Rudy Dawson, Supervisor Environmental Engineering Rudy Dawson, Supervisor Environmental Engineering INSPECTOR DA ROCHA
VIOLATION CODE	DAYS OR DATE TO COMPLY SOURCE CODE EQUIPMENT CODE
	While at one Ther site conduction in inspection with Mr. Genry Krowie, Surrasson Raj Sinha accompanied by Dr Riter Warry telline to check at Allud-Signal for an great
	Clan moveral Atte plant I a brown That all stools work Clar Spake with Messes Dayl Quem, Plant Moray
	1 Mr. B Brian stated that when Vyeres Sucha and Worn
	MOTE: AS installed a new for for Still#4
	continue to fine torse the home. A-S has
	bour in regarition fort greaty mollens
	2) WStill #4 stock began emilling ofcom sport at
	3 Mr. Dan, a dhitlette a problem with de brogging the berner but it will not be a servicent
	(4) AS will continue to make corrections / regins
	to the besser ontil it ours clear.

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COMPA AND/OR OWN	Allied Signal, OCCUPANCY
RESPONSI	Daryl Quinn 842-4400 nule Plant Manager
PERS ADORE	1200 Zug Island Road, Det, Michigan 48209 Fax 842-2804
APPARE	Rudy Dawson, Supervisor Environmental Engineering
SOUF AND PROBAI CAL	OR INSPECTOR DA KOUDA
VIOLATION CODE	DAYS OR DATE SOURCE CODE EQUIPMENT CODE
	This is a continue trong a C.R. instated by his Sinher
	greaty for Tir Still #4. He szaha with Mily Kinkesu and
	This and mit obtain a someled noterial "At Irid"
	Sofre with Klessen Rich, Down, Bab O'Brian and Gordon ale.
	The meterit find in tor Still #4 is finely grown Cont Tor
- true	Battons mixed with Calon Block Feed Stock Conother found
	Coult a Battom). They one at a 50-50 mig. AS world
	lite to go to a 75-25 mey alitying now Coulter Battons
	Then Calon Bloke.
	(2) O freity is due to problems when They change The mix ratio.
	Herrisa Resorch + Develont (R+D) problem.
	3 Heres D. Quem, R. Dowson + G. Calquill meet
	my Twelle to @ produces con lette outlines the
	(b) Produce for Botion Clan with a
	(hodor an 'Action blen with a
	final/coult tion date.
	(1) We walked out into The plant. I obtained a glit
	some of motive from Vonle#63-Afford" to
	TN Still # 4. Soe cettorland
-	(Kitim)
l	i

Air Pollution Cor rol Division	Sample # 494 43
Wayne Courty /lealth Department 640 Temple/Street, Suite 700 Detroit, Michigan 48201 Telephone (3/3) 832-5000	Date Submitted 5-27-44
REQUEST FOR SAMPLE ANALYS	SIS
SAMPLE INFORMATION Name Allied-Signal	
Address 1200 Zug Loland City Dutyout	County Wayne
Sampling: Date <u>5-26-94</u> Time	1:30 PM.
Sample Condition "Astical" fartule #43 to	Too 3 tell # 4
Collection Method South San di	
Field Inspector Da Return Resu	its to
Pollution Occcurence: Date	Time
Weather Conditions	
Additional Information: The mentarial is a 50-50 may	of Carpon Blade Food ad
1. Suspected Source Source Type Substances Suspected	Thes: Cherry Lead, Codmission
2. Suspected SourceSource TypeSubstances Suspected	
RESULTS	ANALYTICAL METHOD
Date Seal Broken Resealed By 0.51% SULFUR 21.3 PPM Pb 0.26 PPM Cd Too little chromium to detect.	☐ P. L. Microscopy ☐ X-ray Diffractometry ☐ Chemical Spot Tests

Date Results Reported June 20, 1994

Date Results Issued _

6-20-94

Chemist _____

Fred Muxlow

LOCATION ADDA	Zug Island Road Zug Island Road Zug Island Road Zug Island Road
COMPAI AND/OR OWN RESPONSIB PERSO ADDRE	Daryl Quinn 842-4400 nnte Plant Manager 1200 Zug Island Road, Det, Michigan 48209 Fax 842-2804 Rudy Dawson, Supervisor Environmental Engineering
APPARE SOUR AND PROBAS CAU	CE CE INSPECTOR DA ROCHA
VIOLATION CODE	DAYS OR DATE TO COMPLY SOURCE CODE SOURCE CODE
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	strok.
	(1) Conderted SEO - absent heat shimmer about the
	Hoch exit.
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	(e) in

WAYNE COUNTY DEPARTMENT OF HEALTH Air Pollution Control Division VISIBLE EMISSION OR ODOR EVALUATION FORM

Observer: Da Rosh			Name:			llid Se				
						1200 Zog Johns				
Observation: Tax Stall #4 A	tock	0			45	•	0	15	30	45
	0					30	0	0	0	0
Stack — Distance From:	1					31	0	\mathcal{C}	0	0
— Height /00 /	2					32	O	0	C	C
Wind — Speed <u>5-/ℓ</u>	3					33	C	O	0	0
- Direction N	4					34	0	0	0	0
Sky Condition party alasy	5					. 35	0	ට	Ö	0
Color of Emission	6					36	0	0	0	C
Plume Character Lattura	7					37	0	0	0	0
- Fuel Conta Batton	8					38				
— Began <u> 31,20 Р</u> М	9					39				
— Ended 3:38 1/19	10					40				
Sketch: Source	11					41				
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	13					43				·
	14					44				
	15					45				
	16					46				
Observer	17					47				
	18					48				
	19					49				
	20	0	4	0	0	50				
Sun	21	Ô	0	\circ	0	51				
Odor	22	C	\mathcal{C}	0	C	52				
Description	23	~	C	0	C	53		·		
	24	C	0	C	O	54				
Remarks: Observation whom you	25	C	C	0	0	55				
to elle 1 8019 W. J. Hoson	26	0	\mathcal{C}	\mathcal{C}		56				
4 2	27	Ĉ		\bigcirc	\mathcal{C}	57				
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Observer's Signature:						Elatore				
APC-89 Rev 6-87							<u> </u>			·

MEMORANDUM WAYNE COUNTY HEALTH DEPARTMENT Air Pollution Control Division

TO: The File

FROM: J. E. Da kocha, Air Pollution Control Inspector

DATE: May 12, 1994

SUBJECT: Complaint Referral on ALLIED SIGNAL

1200 Zug Island Road Detroit, MI 48209

Inspection Date: May 6, 1994

I spoke with Mrs. Karen Kendrick-Hands at about noon on Friday, May 6, 1994 via telephone (313) 885-7588. She stated that at 4:15 P.M. on May 5, 1994, she and her husband observed a leak from the 12" diameter pipe between tanks 1 and 2. The plume travelled toward the green house on Cary Street. She said, "It smelled like benzine, a chemical smell/asphalt." A sign on the tank says "Caution - Benzine." The wind was from the Rouge River.

She further stated that her husband's firm has been hired by the Delray community to handle odor issues. She was concerned that she had a contractor relationship with the community but that she was complaining as a private citizen. She was also surprised that she did not receive a call last night. It was now 18 hours since she called the complaint to the answering service.

Prior to entering the plant, I drove via side streets to Allied Signal's north perimeter where the 5 cooling tanks are located. I could not see the Benzine signage from W. Jefferson. It was not until I was on Barnes Street, within 25' of the tanks, that I could read the signage. I observed a steam plume between tanks 1 and 2.

Spoke with Mr. Bob O'Brian, from Environmental. We discussed the Complaint Referral. Tank #1 contains recirculated water, tank #2 contains driveway sealer tar base (DST). After checking his records, he responded that there was no processing of these tanks during the time frame of the Complaint Referral.

We walked to the north perimeter of the plant where tanks 1 thru 5 are located. At the base of tank#1 (south site, not observable from Barnes Street) I observed 2 steam lines with three valves — one valve was partially open to handle blow by. Steam from this open valve was carried by the wind between tanks 1 and 2. It is my determination that the open valve was the source of the steam plume observed yesterday between tanks 1 and 2.

JD:LS

Attachments

cc: R. Sinha

- P. Warner
- G. Krawiec
- R. Zabick

File

STORAGE TANKS CONTENTS & CAPACITIES

TANKANO		CAPACITY
TANK NO.	CONTENTS	GALLONS
1	WATER	53,500
2	DST	53,500
3	TAR BOTTOMS	53,500
4	COAL TAR PITCH	53,500
5	TAR BOTTOMS	53,500
E	COAL TAR OIL	5,700
R	CARBOLIC OIL	12,500
S	COAL TAR OIL	12,500
V	COAL TAR OIL	12,500
W .	COAL TAR OIL	12,500
X	COAL TAR OIL	12,500
Υ	OUT OF SERVICE	12,500
50	COAL TAR PITCH	50,000
51	COKE OVEN TAR	250,000
52	COKE OVEN TAR	500,000
53	COKE OVEN TAR	250,000
54	COKE OVEN TAR	250,000
56	COKE OVEN TAR	78,000
57	COAL TAR PITCH	75,000
58	COAL TAR OIL	100,000
59	COKE OVEN TAR	71,000
60	COKE OVEN TAR	71,000
62	# 2 FUEL OIL	16,800
63	COKE OVEN TAR	20,000
64	COAL TAR OIL	27,000
65	COAL TAR OIL	250,000
66	SYBILL MATERIAL	250,000
70	OIL PITCH	100,000
71	L.C.O.R.	29,000
73	EMPTY	26,000
75	EMPTY - OPEN	28,000
77	COAL TAR OIL	11,000
78	ROOFING PITCH	20,000
81	EMPTY	10,000
82	EMPTY	10,000
83	EMPTY	10,000
1 BLO TK,	COAL TAR PITCH	13,000
2 BLO TK,	COAL TAR PITCH	13,000
3 BLO TK.	COAL TAR PITCH	10,000
		•

NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL. REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO THE ENVIRONMENTAL DEPARTMENT.

STORAGE TANKS CONTENTS & CAPACITIES

TANKANO		CAPACITY
TANK NO.	CONTENTS	GALLONS
544	COKE OVEN TAR	1,000,000
714	WASTE WATER	250,000
715	COAL TAR OIL	250,000
716	WASTE WATER	250,000
717	EMPTY	100,000
718	COKE OVEN TAR	78,000
719	CARBOLIC OIL	50,000
720	CARBOLIC OIL	50,000
721 -	CARBOLIC OIL	50,000
722	CARBOLIC OIL	50,000
723	CARBOLIC OIL	50,000
834	TAR BOTTOMS	50,000
835	COKE OVEN TAR	50,000
1220	COAL TAR OIL	1,000,000
ST-1	T.H. WASTE WATER	50,000
ST-2	LCOR/CARBOLATE	5,000
ST-3	T.H.WASTE WATER	50,000
ST-4	CAUSTIC	2,000
# 2 BATCH STILL	C.O. TAR OR OIL PITCH	10,000
# 3 BATCH STILL	C.O. TAR OR OIL PITCH	12,500
# 4 BATCH STILL	C.O. TAR OR OIL PITCH	12,500
REC. SCRUBBER	CONTAMINATED WATER	3,000
50 TK. SCRUBBER	CONTAMINATED WATER	3,750
T/C SCRUBBER	CONTAMINATED WATER	3,000
CARB. OIL SCRUBBER	CONTAMINATED WATER	3,750
A.R.M. SCRUBBER	EMPTY	1,000
ARM RECIEVING VESSEL	EMPTY	40,000
SULFURIC ACID TK.	93% SULFURIC ACID	5,000
NEUT. TK.	CONTAMINATED WATER	2,000
COALESCER	CONTAMINATED WATER	2,000
VENT CONDENSER -COOLERS	CONTAMINATED WATER	10,000
GAS TANK	UNLEADED GASOLINE	1,000
DIESEL TANK	DIESEL FUEL	1,000
2 EA. HI FLASH REC.	EMPTY	580 EACH

NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL. REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO THE ENVIRONMENTAL DEPARTMENT.

STORAGE TANKS CONTENTS & CAPACITIES

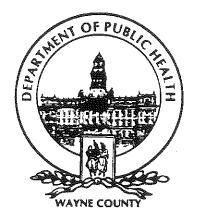
		CAPACITY
TANK NO.	CONTENTS	GALLONS
PITCH BAY 14	EMPTY	N.A.
PITCH BAY 15	EMPTY	N.A.
PITCH BAY 16	RFG. PITCH STORAGE	N.A.
PITCH BAY 17	RFG. PITCH STORAGE	N.A.
PITCH BAY 19	EMPTY	N.A.
API OIL WATER		•
SEPARATOR	WASTE WATER	33,225
FILTER PRESS TK. #68	EMPTY	12,000
FILTER PRESS TK. #69	EMPTY	6,000
FILTER PRESS PRECOAT TK.	EMPTY	2,000
FILTER PRESS FILTRATE TK. 1	EMPTY	2,000
LARGE SUMP	REMOVED FROM SERVICE	0
SMALL SUMP	COKE OVEN TAR	27,500

NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL. REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO THE ENVIRONMENTAL DEPARTMENT.

AIR POLLUTION CONTROL DIVISION MAIN OFFICE

640 Temple Street, Suite 700 Detroit, Michigan 48201 (313) 832-5000 FAX: (313) 832-5066

DOWNRIVER OFFICE
Eureka Road
231 Eureka Road
Wyandotte, Michigan 48192
(313) 281-8396
FAX: (313) 281-6973



EDWARD H. McNAMARA
County Executive

Bernard N. Kilpatrick
Assistant County Executive

Cynthia Taueg, MPH
Director-Health Officer
Donald Lawrenchuk, M.D., MPH
Medical Director

August 4, 1994

Allied-Signal 1200 Zug Island Road Detroit, MI 48209

Attn: Mr. Daryl Quinn, Plant Manager

Hammermill/Mixer/Briquettor and venturi scrubber #7602 and #7626 are being revoked per Section 408, of the Wayne County Air Pollution Control Ordinance, Part C, 3, which states:

"If an emission source is not used or operated for 24 consecutive months, the certificate of operation shall be revoked with notice, unless a longer period of non-operation has been approved by the Division as a condition of the certificate, or the emission source is taken out of service temporarily for maintenance, repairs, economic reasons or for other cause acceptable to the Division."

If this division receives no response within 15 days of the date of this letter, all applicable certificates of operation will be revoked and equipment affected may be returned to use or operation only after applying for an installation permit under Section 401 of the Wayne County Air Pollution Control Ordinance and complying with all the requirements of that section.

Respectfully,

J'E. DaRocha

Air Pollution Control Inspector

c: Engineering Section

(a:AlliSig.let/wpJDnmw)

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Allied-Signal Inc. Detroit Tar Plant 1200 Zug Island Road Detroit, MI 48209 Telephone (313) 842-4400

Mr. Jack Da Rocha, WCAPC Inspector Wayne County Dept. of Public Health 640 Temple Street, Suite 700 Detroit, MI 48209

Dear Mr. Da Rocha

The purpose of this letter is to explain the reason for the opacity exceedances that have been observed from time to time while operating the new burner on the #4 Tar Still at the Detroit Tar Plant.

This burner was installed for purposes of being able to fire coal tar oil that has a higher viscosity content than the other coal tar oil which is fired on the other burners at the plant. Initially, the opacity was attributed to insufficient combustion air. The combustion air problem has since been addressed and corrected. It is important to note that the fuel used during the initial start-up of this burner was the fuel used on the other burners in the plant. This was done to minimize problems that are common when starting up new pieces of equipment.

Once we were satisfied with the reproducibility of the start-up and operation of the burner when using the existing plant fuel, we began operating it using a blend of the fuel having the higher viscosity content (HVF) and the existing plant fuel (EF). The initial blend was 1/3 HVF and 2/3 EF. This blend could be fired using the same parameters as before. Parameters include the pressures the fuel and atomizing steam are kept at.

The next blend was 1/2 HVF and 1/2 EF. Opacity problems developed here occasionally because it was found the fuel pressure had to be increased in order for the burner to function properly. Eventually the proper parameters were found and recorded. This is the blend we are currently using.

The next step will involve increasing the HVF content until it is found it is not feasible to add anymore. Whether this ultimate blend will be 3/4 HVF and 1/4 EF or 100% HVF remains to be seen. At this point we will insure there is reproducibility in firing this blend and the parameters will be recorded and utilized in the subsequent start-ups of this burner. The major problems with the burner are behind us so the time period it will take to do this should not be long.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Gordon Cale

cc R. Sile

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1 2	ZUG ISLAND ROAD AREA GRID DATE VIOLATION 26 2455 08 29 9 4
COMPA AWO RODGE AWO RODGE PERS ADORE	Daryl Quinn (842-4400) 1200 Zug Island , Detroit, MI 48209 Bob O'Brien, Environmental
APPARE SOUF ANO PROBAI CAU	OCE INSPECTOR DA ROCHA DA ROCHA
VIOLATION CODE	DAYS OF DATE TO COMPLY SOURCE CODE SOURCE CODE
	Spoker with Messes Day Quin and Bab Olbrien on the CEM
	Tout recognical to Mr. Daser Baig, Engin.
	1. This inspection is a response to the attorbed letter. It appears
	incumbert on WCAPCD to dictate the Ornation of the CEM-
	(2) (De ronious blue Front on the installation of the Fluidged
	Bel Brita (+BB)
	(3) Inpeted the +BB/CEM/York Shirty/main steele -
	(4) Tooks de tailed majorsement of same
	(5) Quer was satisfied with The measures
	a A rear wil perform appelations from that messooms to see
	@ WCAPCD will respond in wiling.
	(Roton)
······································	
***	·



August 5, 1994

Lets finally resolve this CEM issue and Work with Jamal and Quisa and lets agree Maison and lets agree muchat is neighble. This issue seems to be this issue seems to be Mr. Jack DaRocha Enforcement Officer Wayne County Air Pollution Contro 640 Temple, Suite 700 Detroit, MI 48401

Re: Fluidized Bed Boiler Opacity

Dear Mr. DaRocha

As you know, the Fluidized Bed Boiler (FBB) has been idle since March 18, 1994 due to lack of fuel. We are actively pursuing permits which will allow us to burn alternative fuels in the FBB. Until the time that we receive the additional operating permits, the FBB will remain idle. We request your guidance in the resolution of the opacity CEM location problem.

Please note that relocation of the opacity CEM in compliance with 40 CFR Part 60, Appendix B, Spec 1 will not be a practical solution to this issue. The FBB and York Shipley Boiler share a common stack at the specified compliance location, and differentiation between the two exhaust streams is not possible when both boilers are on line at the same time.

If you have any questions regarding this information, feel free to contact me at 842 5871.

Sincerely,

Robert A. O'Brien

Environmental Assistant

CC: Daryl Quinn - Detroit

Finn Bohn - MTO

Rick Goetz - Ironton

Bill Yanovitch - Chesterfield

Surt a. OBin

LCERTON ADOR	AREA GRID DATE VIOLATION
1 2 0	0 ZUG ISLAND ROAD 26 2455090894
ANDIOR OWN	Allied Signal OCCUPANCY
RESPONSIBI PERSO ADDRE	1200 Zug Island , Detroit, MI 48209 FAX 842-2804
APPAREI SOUR	Bob O'Brien, Environmental
ANDA PROBAB CAU	DA DOCTIA
VIOLATION	DAYS OR DATE TO COMPLY CODE SOURCE CODE
	Attended to speak with Mr. Clay to Oakon He wasned in
	a Solo with his society Ms Shirley Dein (Dan)
	(2) She complained about a bocuing block make at 11: 45 Am on
	August 25, 1994. She alsowed it only when she was outside
	(10-15 minutes). She tool not see what it subsided.
	3 Dashed That of Mr. O obsern had any questions to cooled
	call me tomorow AM.
	Date with Mr. Bals Jones.
	& No provided me with copies 1 the 5 internal complaints -
	selatteded.
	(2 Workers complained about paterules to material on Their wind-
	shelp mot. To shed that he call me so that Dan
	take soules - analysis can help us betimen the some.
o-consis	3 I removed him that details suchas do to fine, duration,
	wind distron, oder descrition, gents descrition word injected
	and the worker should include all provide date.
	,
	Conditation Odor Evaluation on VF growth at the south force line, just east/south east of A.C. Ar NOV is not workered.
	sonth force line, just east/ south east of A-S. Ar NOV is
	not worked.
1	Soolo with Mr. Bab O Burn. O Informed him of the CR. (2 He chished his records. The wind was out of the west/ noth west sudminate driving Avant 25,724, 1994
	O Dunfamed him of The CK
	12 He choosed his records. The west was out of the west
	noth west sudaminantly driving Hogust 25 + 21, 1994

1 2	0 0 ZUG ISLANI	ROAD		2 6 2 4 5 5	
COMPA NO/OR OW! RESPONSI PERS ROCA	Daryl Quir	nn (842-4400) Island , Detroit, M	I 48209	OCCUPANCY TITLE Plant M FAX 842-28	anager 04
APPAR SOUI AND PROBA CA	ACE POR				DA ROCHA TION REPORT
OLATION ODE	DAYS OF TO C	R DATE DMPLY	SOURCE CODE	EQUIPMENT CODE	
	(3) (0) (q) (3)	the day information of the was nothing	tulim &	S was quat cosed material routed Their	on air soulder
e.	-// /	- C.R. time	fore.	J	0
-	(D)	When Bab O'Bo	in i out	of town Mr.	In Quin
		alls in any "O	utors "	0	- 0
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WAYNE COUNTY DEPARTMENT OF HEALTH Air Pollution Control Division VISIBLE EMISSION OR ODOR EVALUATION FORM

Date: $\frac{\cancel{9}-\cancel{8}-\cancel{9}\cancel{9}}{\cancel{9}-\cancel{8}-\cancel{9}\cancel{9}}$		Name	e:	Allud-Signel						
Observer: Da Rock	Control of the state of the sta		Addr	ess:_	1200 Zug Doland					***************************************
Observation: Oder Emb	whon	0	15		45	•	0	15	30	45
	0 .					30				
Stack — Distance From: 500'	*					31				
— Height <u>4</u>	2					32				
Wind — Speed/C	3					33				
- Direction 60	4					34				
Sky Condition Sime	5			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		. 35				···
Color of Emission N/A	6					36				
Plume Character N/H	7					37				
- Fuel NA	8					38				
— Began 3:45 2007	9					39				
— Ended <u>공:54 P사기</u>	10					40				
Sketch: \\////	11					41				
VW	12					42				
Source	13					43				
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Observer	16					46	1	2	/	1
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	20					50	/	0	1	Z
Sun	21					51	2	0	0	0
Odor Porting for	22					52	/	0	0	0
Description Cost reg 150	23					53	0	0	0	/
	24					54				
Remarks: Observer tel	25					55				
how dellow from It sortan	26					56				
Vest of south Sand line	27					57			382.	
	28					58				
	29					59				

Observer's Signature:

APC-89 Rev 6-87

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BUSINESS BRIEFS WSJ 10/28/94

AlliedSignal's Third-Quarter Profit Rose 15% to a Record \$189 Million

MORRIS TOWNSHIP, N.J. — AlliedSignal Inc. said its third-quarter profit rose 15% to a record \$189 million, or 67 cents a share.

Chairman Lawrence A. Bossidy said in an interview that he expects the current earnings momentum to continue at least through 1997. Citing a "decent economy" in the U.S. and emerging strengths in the company's markets in Europe, he estimated that profit for next year will be up "13% to 17%" from this year.

The latest net compared with \$165 million, or 58 cents a share, in the year-ago period. Sales rose 11% to \$3.1 billion from \$2.8 billion a year earlier.

Mr. Bossidy said each of the company's three businesses posted double-digit earnings increases. And for the first time in four years, he said, all three businesses posted sales increases. The company, which is based in Morris Township, N.J., makes automotive and aerospace products and engineered materials.

In late New York Stock Exchange trading, AlliedSignal fell 12.5 cents to \$34.375.

The latest results, which were in line

with Wall Street analysts' expectations, were helped by the company's continuing cost-cutting measures and productivity improvements.

Mr. Bossidy said he's "comfortable" with analysts' estimate that the company will earn 71 cents a share in the fourth quarter. That would be a "13% increase" from the strong year-ago quarter. If Allied-Signal were to report that amount for the fourth quarter, the company's full year net income would amount to \$2.66 a share, compared with the 1993 net income of \$2.31 a share.

In making a forecast of his own, Mr. Bossidy said he expects the company's 1994 earnings to range between \$2.61 and \$2.70 a share.

For the nine months, the company posted earnings of \$554 million, or \$1.95 a share, compared with restated profit of \$233 million, or 83 cents a share, a year earlier. Excluding the accounting changes related to post-employment benefits in the 1993 period, the company earned \$478 million, or \$1.69 a share.

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STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
MARLENE J. FLUHARTY
GORDON E. GUYER
STEWART MYERS
AYMOND POUPORE



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING P.O. BOX 30028 LANSING, MI 48909

DELBERT RECTOR, Director

August 5, 1991

Ms. Shari Kolak, 5HR-13 Michigan Section RCRA Permitting Branch U.S. EPA - Region 5 230 South Dearborn Street Chicago, Illinois 60604

Dear Ms. Kolak:

SUBJECT: Allied Signal, Inc., Detroit

MID 005 517 198

The facility's information relative to a nonhazardous waste determination for a waste pile at the Detroit Tar Plant has been reviewed, as requested by Mr. Richard Traub in his May 22, 1991, letter to Mr. Steve Buda. Due to a lack of specific information in the submittal from Allied Signal, a meeting with the company was requested by Waste Management Division (WMD) staff. Due to scheduling conflicts between facility and WMD staff, this meeting did not take place until July 24, 1991. During the meeting, Mr. William Yanovitch of Allied Signal explained the basic purpose, associated sampling plan, and actual field work that was done in support of this waste characterization effort.

Based upon Mr. Yanovitch's explanation of the sampling plan, and a visual inspection of the waste pile, it is felt that a representative sampling of the waste was accomplished. The protocol used in the field followed good standard quality assurance/quality control (QA/QC) practice. The innovations used to collect samples at depth were of interest, especially in consideration of the nature of the material.

The data that was generated from the sampling was analyzed by a laboratory that followed accepted QA/QC procedures. Mr. Yanovitch supplied the laboratory documentation relative to the sampling for review. It is attached to this letter for your information and files. The resultant data was statistically analyzed by both Allied Signal and WMD staff. Under both statistical protocols, based upon the waste material, and the ultimate planned use of said material, the

level of benzene falls below the regulatory threshold. If the benzene level, relative to the toxic characteristic leaching procedure (TCLP), was the only concern relative to the classification of this material, it should be considered nonhazardous.

This concludes a summary of the review of the original document, and the information provided by Allied Signal staff both during and after our meeting of July 24, 1991. If you have any other questions regarding this issue, please contact me.

Sincerely,

Elizabeth M. Browne

Env. Monitoring Coordinator Waste Management Division

physicath A. Browne.

517-373-7974

Attachment

cc: Mr. Richard Traub, U.S. EPA

Mr. Steve Buda, MDNR

Ms. De Montgomery, MDNR

Ms. Liane Shekter Smith, MDNR

HWP/C&E File

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SEP 1 6 1991

G.H. Collingwood Vice President and General Manager Tar Products Allied Signal, Incorporated P.O. Box 1053R Morristown, NJ 07962 5HR-13

Re: Allied Signal Detroit Tar Plant MID 005 517 198

Dear Mr. Collingwood:

This purpose of this letter is to inform you that the documentation, supporting the nonhazardous waste determination for a waste pile at the Detroit Tar Plant, has been reviewed.

Based on this review, the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Natural Resources concur with Allied Signal's nonhazardous waste determination. Therefore, the U.S. EPA hereby withdraws Allied Signal's Part A application, filed on September 25, 1990.

If you have any questions regarding this letter, please contact Shari Kolak of my staff, at (312) 886-6151.

Sincerely,

Rich Traub, Chief Michigan Section RCRA Permitting Branch

cc: Liane Shekter Smith (MDNR)

			11/2	YE.							
SIGNATURE	SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA PERMITTING BRANCH (RPB)										
	ILS	INS	MIS	IW/WM	OHS	SWS	RPB	RCRA	WASTE MGMT.		
TYPIS AUTH.	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	ASOC.DR	DIV.DIRECTOR		
51×9			9/13/9/								

120/2/21

\$P\$11 (1) (1) (1) (1)

EPA

FY 1989 HAZARDOUS WAS . . COMPLIANCE MONITORING AND ENF EMENT LOG 1. EPA ID: MID 2005 048222601 2. HANDLER: Bendix Guidance Syntem UPDATE NEW ADDRESS: 5. Date of initial evaluation which E = EPA (S)= State C = Contractor/EPA 5a. Agency responsible is the basis for this report: . . for evaluation: B = Contractor/State 8125188 (circle as applicable) X = Oversight6. Type of Evaluation Covered in this Report: (circle as applicable) Facility Inspected As: (S/T) 1 = CEI (Compliance Eval. Inspection) 7= Part B Call-in Inspection LDF Trans GEN SQG NR 2 = Sampling Inspection 8= Part A Withdrawal Inspection 3 = Record Review> 9= Closed Facility/Units Inspection 4 = CME (Comprehensive GWM Eval.) 10 = Other General Inspection 5 = Compliance Schedule Evaluation 11 = Case Development Inspection 6= Citizen Complaint 12= O&M Inspection Facility Filed As: (S/T) CA Oversight Inspection Trans GEN SQG NR Date of evaluation covered by this report 1212188 (if different from #5 above) 7a. Eval Comment: 8. CLASS AND VIOLATIONS: VIOLATIONS AND RELEASES Key: GWM C/PC FIN PT B CMPL | MAN OTH L BAN X = Violations, no specialties class B = Violations and specialty 0 one S = Same violation or specialty class Z = Pending determination 0 O = No violation or specialty found two SPECIALTIES: X X X X X X X X S S S S S S S S I = No insurance only Z Z Z Z Z Z Z Z C = CA Schedule Violation 0 0 O 0 0 0 0 H = High Priority Violation Н H Н Н Н Н Н * = Class I only 幸 C B В 8a. Viol. Comment: RTC RESP AGENCY: E = USEPAS=SIATE **ENFORCEMENT ACTIONS:** X = OVERSIGITI ACTION TYPE DATE OF ACTION LASS AREA OF VIOL COMPL ACTUAL COMPL SCHED PENALTY ASSESSED PENALTY COLLECTED RESP AGENCY Fin 3 8/25/88 9/26/88 12/38

Codes for Types of Enforcement Actions:

01 = Interim Status Compliance Letter

02 = '3007 Information Request

03 = Warning Letter

04 = Administrative Complaint

05 = Final Administrative Order

06 = 3013 Admin Order (initial) /State equiv.

07 = 3013 Admin Order (final) /State equiv.

08 = 7003 Admin Order / State equiv.

10 = Informal Action

11 = Filed Civil Action

12 = Filed Criminal Action

13 = NOV to State (Viol ref'd for St action)

14 = NOV to EPA (Viol reld for EPA action)

15'= CA Initial Administrative Order

16 = CA Final Administrative Order

17= CERCLA 106 Admin Order (EPA)

18 = Civil Referral to St AG / USDOJ

19 = Final Judicial Order

20 = CERCLA 106 fund financed activity

21 = Notice of Non-compliance

22 = Fed. Facility Compliance Agreement

23 = Fed Facility Referral to USEPA IIQ

85 = Insp. refered to USEPA (land ban)

10. Enforcement Comment:

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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
R. CAROLLO
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HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

November 15, 1984

Karen Page
Allied Chemical Corp. Detroit Tar Plant
1200 Zug Island Road
P.O. Box 33950
Detroit, MI 48232

RE: MID 005517198

Dear Ms. Page:

On November 9, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 1200 Zug Island Road, Detroit, Michigan, to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

I have determined that your facility has no deficiencies of the requirements of RCRA in the areas reviewed during that inspection.

Though not deficiencies, I do have the following suggestions:

- Combine the Spill Prevention, Control and Countermeasures Plan (SPCC), and Contingency plan to incorporate the requirements of each plan (see 265.52(b)). If this is not possible, reference the SPCC and Emergency Action Plan in the Contingency plan is such incidences where contingency plan required content are found in other plans, i.e., evacuation plan.
- Note on the site plan where the Hazardous Waste is located. Note that the contingency plan will need an update due to the upcoming departure of Steve Bivane.
- 3. Confirm that Inland Waters has properly marked the Roll-off Box #103 before it leaves your facility to dispose of the Hazardous Waste.

Thank you for the cooperation during my visit.

cc: U.S. EPA, Region V B. Okwumabua Lynne King

Sincerely,

HAZARDOUS WASTE DIVISION

RCRA Inspection Report

EPA Identification Number: M 1 1	005517	198
Installation Name: Allies Chance	NI GRP DERBITTAR P	laut_
Location Address: 1200 Zuca Isl	AND Rd. PU. B- 339	50
City: Darport	State: M. 48232	<u>, , , , , , , , , , , , , , , , , , , </u>
Date of inspection: 1104/24	Time of inspection (from)	10:20 (to) 12:00
Person(s) interviewed	Title	Tel ephone
KAREN PAGE	649-Reduce - 48-EN1-PON EN	a. 313-842-4400
	5 y 2	4
Inspector(s) /	Agency/Title Hwo/MDNR	Tel ephone 312 457-9180
Installation Activity (mark only one	e box)	Inspection Form(s)
Treatment/Storage/Disposal per 40 Generation and/or Transportation	O CFR 265.1 and/or	A
Treatment/Storage/Disposal (no ge	eneration or Transportation)	A
☐ Generation and Transportation	x 2 2	B, C
□ Generation only		В
		C
WAYNE DISPOSED - DISPOSEL	R a	
WASTES GALTAR		P _{IR}
CREASONE USSI NACHTHALENE USSI WASTEWATER TREATMENT (03: SLANDER	<u>\$</u>	
WASTE PLACED IN ZOYA (ROLLOFF BOX - LOCAT	D ON CEMEL

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INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application	on process(es) (EPA Form 3510-3) Ins	pection Form A	section(s)
s01 <u>M</u>	storage in containers		I
s02 <u> </u>	storage in tanks		J
то1 🔟	treatment in tanks	•	J
S04 <u></u>	storage in surface impoundment		K,F
Т02 🔟	treatment in surface impoundment		K,F
D83	disposal in surface impoundment		K,F
S03 <u> </u>	storage in waste pile		L
D81 🔲	disposal by land application		M,F
D80 II	disposal in landfill	b	N, F
тоз ∏	treatment by incineration	•	0/P
T04	treatment in devices other than tank impoundments, or incinerators	s, surface	Q
Other activities			
GENERATOR I	• •	APPENDIX	GN
TRANSPORTER	- · · · · · · · · · · · · · · · · · · ·	APPENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NONE

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

SEE JANUARY 83 REPORT

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		Section B: GENERAL FACILI	TY STAI	NDARDS:	(Part	265 Subpart B)
			YES	МО	NI*	Remarks
1.		the Regional Administrator notified regarding: 265.12				•
	a.	Receipt of hazardous waste from a foreign source?				NA
	b.	Facility expansion?			Colonia com	NA
	c.	Change of owner or operator?		-0.000	Vi-Quillette	NA
2.	Gen	eral Waste Analysis: 265.13			*	• • • • • • • • • • • • • • • • • • • •
-	a.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	Ŋ	(1) The state of t	Ф	
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u> </u>		***************************************	CAST ANALYS SULY 83 WHUAH WARRY CONTRACT CONTRAC
	c.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		· ·	Williams	RATIONIAL - HISTORY - EPA COAL REPORT
3.	Sec	curity - Do security measures includ (if applicable) 265.14	ê:			
	a.	24-Hour surveillance?	<u> </u>		-	
	b.	or i. Artificial or natural barrier around facility?	<u> </u>			forced a dikad
		and ii. Controlled entry?	4			Grand at GATE - 241
	C.	Danger sign(s) at entrance?	Δ		400-Ampone	4 Entrare
4.	0w	ner or operator inspections: 265.15				
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	\$			

		YES	NO	NI	Remarks
	b. Does the owner or operator have an inspection schedule at the facility?	9	•	iù (ina y	
	c. If so, does the schedule address the inspection of the following items:				
	<pre>i. monitoring equipment?</pre>	***************************************	- CE-de-		NA-
	ii. safety and emergency equipment?	A			LIANDED BY SAFERY
	iii. security devices?	<u>\Q</u>			
	<pre>iv. operating and structural equip- ment (i.e. dikes, pumps, etc.)?</pre>	<i>-</i> X	*		Sodies pames de.
	v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	P			790day storace
	vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	\$			doily
	d. Are areas subject to spills inspect- ed daily when in use?	<u> y)</u>	T O-10		· · · · · · · · · · · · · · · · · · ·
	e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	Ŋ		-	
	f. Does the inspection log contain the following information:				
	i. the date and time of the inspection?	X			
	ii. the name of the inspector?	Þ		······	
	iii. a notation of the observations made?	$\overline{\lambda}$		7	Mill check if of
	<pre>iv. the date and nature of any repairs or remedial actions?</pre>	<u>\Q</u>			INCAND PROPERTY MARK
5.	Do personnel training records include: 265.16				
	a. Job titles?	X	_	-	
	b. Job descriptions?	N			

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			IEO	INO	14.7	Velia I V 2
	c.	Description of training?	\$			
	d.	Records of training?	<u>*</u>	WW.dalas		
	٤,	Did facility personnel receive the required training by 5-19-81?	\$		- Considera	
	f.	Do new personnel receive required training within six months?	7	49 40001600-lo	di-monte establish	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	JE0		CAST	TRAINING - 7/16/84
6.	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			•
	a.	Special handling?				
	b.	No smoking signs?		 		
	c.	Separation and protection from ignition sources?				*

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			•		
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Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	VEC NO NI	Remarks
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	Y X	Kenark S
If required, does the facility have the following equipment: 265.32	teriformen ettoferansia ettoragge	
a. Internal communications or alarm systems?	L. L	
b. Telephone or 2-way radios at the scene of operations?	¥	WALKINGTALKIES ON PRODUCTION
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>	
Indicate the volume of water and/or f	oam available for f	ire control:
1500 apm - 300 051	- HUTRANTS	Hookes To River
Testing and Maintenance of Emergency Equipment: 265.33		
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	9	
b. Is emergency equipment maintained in operable condition?		Fire extinouistics - contract 2010 packs - 475T 105pec. 10121/2
Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	· <u>V</u>	
Is there adequate aisle space for unobstructed movement?		
Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	MINISTER,	CETTER STATING ARRHNGEMEN
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? If required, does the facility have the following equipment: 265.32 a. Internal communications or alarm systems? b. Telephone or 2-way radios at the scene of operations? c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Indicate the volume of water and/or for the string and Maintenance of Emergency Equipment: 265.33 a. Has the owner or operator established testing and maintenance procedures for emergency equipment? b. Is emergency equipment maintained in operable condition? Has owner or operator provided immediate access to internal alarms? (if needed) 265.34 Is there adequate aisle space for unobstructed movement? Has the owner or operator attempted to make arrangements with local	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? If required, does the facility have the following equipment: 265.32 a. Internal communications or alarm systems? b. Telephone or 2-way radios at the scene of operations? c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Indicate the volume of water and/or foam available for formergency Equipment: 265.33 a. Has the owner or operator established testing and maintenance procedures for emergency equipment? b. Is emergency equipment maintained in operable condition? Has owner or operator provided immediate access to internal alarms? (if needed) 265.34 Is there adequate aisle space for unobstructed movement? Has the owner or operator attempted to make arrangements with local

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Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

			YES	NO	NI	Remarks
à		the Contingency Plan contain the lowing information: 265.52				
	à.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	×			Jup Jaw Continging phologorial and a part of ACL Three PLANS - CONTINGENCY- SPCC - EMERGENCY ACTION PLAN
	b.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services				STAFF ATTEND LAMPTON FIRE TRAINING IN SARNIA
		pursuant to §265.37?	<u> </u>	-	-	DER DESTONG 6 3 DAY/WEEK CLISIC
	Ċ.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as	,			ON SITE.
		emergency coordinators?	4)	s «		DEEDS UPDATE SOON
	d.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	A CONTRACTOR OF THE PARTY OF TH)	·	As upcoming CHANGE IN PERSONNEL
	e.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternation	e •	.		
		evacuation routes?)	X	<i></i>	,,,,,	EMERGERCY ACTION PLAN
2.	ava	e copies of the Contingency Plan ailable at the site and local ergency organizations? 265.53	T	ATTIMATAMENTI	.	AT SITE - FORMHUS/ GROUP (EADERS OFFICES
	·	OF.	D-1 HA	ZAR	Dow	NOTE LOCATION 4/82-A WASTE BOY ON

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			YE S	NO	NI	Remarks
3.	Eme	rgency Coordinator 265.55				
	ġ.	Is the facility Emergency Coordinator identified?	4	979 politica mislo maista no	abalacada manap	
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	8	TO THE PARTY NAMED IN COLUMN		
	С.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	Q	and an extension of the second	Millio	
4.	Eme	ergency Procedures 265.56				•
	at Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occedures listed in 265.56?		-		NA.

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	·					
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Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E) YES NO NI Remarks 265.71 ** 1. Use of Manifest System Does the facility follow the procedures listed in \$265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) b. Are records of past shipments retained for 3 years? Does the owner or operator meet requirements regarding manifest discrepancies? ** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources. 3. Operating Record 265.73 Does the owner or operator maintain an operating record as required in 265.73? Does the operating record contain the following information: i. The method(s) and date(s) of each waste's treatment. storage, or disposal as required in 40 CFR Part 265 Appendix I? The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced

by a manifest.)

***iii. A map or diagram of each

cell or disposal area

to specific manifest number, if waste was accompanied by

^{***} only applies to disposal
 facilities

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			YES	NO	NI	Remarks
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		•	-	
	ív.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	×	40-1		WARE MACHOIS
	٧٠	Reports detailing all incidents that required implementation of the Contingency Plan?	Stillatili keen milek		-q.	None
	vi.	All closure a nd post closure costs as applicable?	A			(nor upomz ozlialat
	Availa	ability of Records 265.74	·			
	under	ll facility records required 40 CFR Part 265 available for ction?	V			
. 4	**Unman	ifested Waste Reports 265.76				
	h 9 w	as the facility accepted any azardous waste from an off-site enerator subject to 40 CFR 262.20 ithout a manifest or or shipping aper?				
	o d a	f "a" is yes, provide the identity f the source of the waste and a escription of the quantity, type, no date received for each unmaniested hazardous waste shipment.		SEASON SE		
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^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

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	e e			
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Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

				YES	NU	NI	Remarks
1.	Clo	sure	265.112				
	3.		he facility closure a available for inspection?	N	space of the state of the space of the state	\$100 Agricultures	Modure PLAN - Remove - STABALIZE WASTES
	b.	Does	the plan identify:				STABACIZE WASTES
		-	maximum extent unclosed dur- ing facility life?	مسروبيس مشت			JA
		ii.	<pre>maximum hazardous waste in- ventory?</pre>	\$	WILLER THE CONTRACT OF THE CON	allen jüney perçeye	
		î۷.	estimated year of closure?	_0_		*	
		٧.	schedule of closure activities?	Ø	وسعفين		
	c.	Has	closure begun?	4	<u> </u>	«= -1 /	***************************************
٤.	Pos	st-Clo	osure 265.118				·
	å.		the post-closure plan available inspection?		40°C		
	b.	Poes	s this plan contain:				<u>.</u>
		j.\	description of groundwater monitoring activities and frequencies?			ر المساعدة المارية الم	
		ii.	description of maintenance activities and frequencies for				
			AA. integrity of cap, final cover, or containment structures, where applicable			and the second	
			BB. facility monitoring equip-				
		iii.	ment name, address, and phone number of person or office to contact during post-closure care period			epitere en	
	¢.	Has	the post-closure period begun?	1	· <u>· · · · · · · · · · · · · · · · · · </u>	(CFC)	
	d٠		the written post-closure cost imate available? 265.144			A-F-COLUMN CONTRACTOR	
							*

^{*}Applies only to disposal facilities.

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Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks - INLAND Flo
	Are containers in good condition? 265.171	4		***************************************	NERDS CO. NAME AND GEAT
2.	Are containers compatible with waste in them? 265.172	<u>\delta</u>	Valedoù a c		(2TTERING)
3.	Are containers managed to prevent leaks? 265.173	<u> Y</u>			
4.	Are containers stored closed?	industrialité (files			for yer Bon
5.	Are containers inspected weekly for leaks and defects.	\checkmark		وسينش	DAICY
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	\ 	ndje. Stansiklanja panaga	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	 /			
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			<u> </u>	

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Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
3.	Do continuous feed systems have a waste-feed cutoff?
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?
5.	Are required daily and weekly inspections done? 265.194
6.	Are reactive & ignitable wastes in tanks protected or rendered non- reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)
8.	Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
	Tank capacity:gallons
	Tank diameter:feet
	Distance of tank from property linefeet
	(See table 2 - 1/through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

		`	

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	NO	NI	Remarks
9	Are waste piles covered or protected from dispersal by wind? 265.251	-			
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	NEED for which have seen some			
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253				
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	_		· ·	
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?			dilitirant minapay.	
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	-	216	(
7.	Are piles of incompatible waste protected by barriers or distance from other waste?				

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 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Sect	ion E	B: MANIFEST REQUIREMENTS (Part 262, Subpart	B)			
		•	YES	NO	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40	4	Ome Poisson		General constraints and public distances in supplying the sets of the constraints of the
(2)	moni	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.)	fra	m W	ay 1 To present
(3)	fol' cop fest	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manitis) that do not contain the critical ments). 262.21			Haule	Ay 1 To present R-12 CAMP WAYNED Spor
	٠6	Manifest document number?	9		-	
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u>L</u>		6 .	
	с.	Name and EPA ID Number of Transporter(s)?	9		· 	
	ď.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	4	- 100 ou m		
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	Ą		> 	
	f.	The total quantity of waste(s) and the type and number of containers loaded?			8.6	
	g.	Required certification?	\$. 	a 	
	h.	Required signatures?	V	-		
(4)	Rej	ourtable exceptions 262.42				
	ā.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility went.	e gen	erato	or has	NOT received a
٠	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26	numb 2.42)	er fo	or which	th the generator gional Administra-

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Sect	.ion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart (2)		
			YES	NO	NI	Remarks
	with (Rec	vaste packaged in accordance DOT regulations? Quired prior to movement of ardous waste off-site) 262.30	P			
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations. terning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	V			
3.	lf r	required, are placards available to nsporters of hazardous waste? 262.33	<u> </u>			
4.	was with and	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects option Section D. If the installation elects option ns: See 40 CFR 262.34 January 11, 1982 Rev	cility restri ion A, n B, co	[265. cts a check mplet	l(b)] ll ac this te the	or (B) in accordance cumulation to tanks box and skip
	ā.	Is each container clearly marked with the start of accumulation date?	V	804 1NT0	AT W Roc	ork at Ation - Dumper
	b.	Have more than 90 days elapsed since the date inspected in (a)?	ammy or am-	P		· · · · · · · · · · · · · · · · · · ·
	С.	Do wastes remain in accumulation tanks for more than 90 days?		N	•	No TANKS - USE ROMOFF
	đ.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<u>V</u>		· —	
Sec	ction	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpa	rt D)		
1.		e all test results and analyses	YES	NO	NI	Remarks
	mir	eded for hazardous waste deter- nations retained for at least ree years? 262.40	<u>/</u>		·	
<u>Se</u>	ction	n E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E)		
1.		s the installation imported or ported Hazardous Waste? 262.50	«reconnections	<i>P</i>		
		f answered Yes, complete the following applicable.)			,	· · · · · · · · · · · · · · · · · · ·
	ā.	Exporting Hazardous waste; has a generator:	,			

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			YES	NO	NI	Remarks
i		ified the Administrator in ting?		Whitedleining,	The Office Service Ser	
	110	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?		Christonenichangs		
	iii.	Met the Manifest requirements?	- William Walter	topida		44604 community de manager film manager (FID) de manager
b.	the g	rting Hazardous Waste; has generator met the manifest irements?		•		

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STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H, WHITELEY



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

November 8, 1983

Mr. Steven Bivone
Superintendent, Technical & Engineering
Allied Chemical Corporation, Detroit Tar Plant
1200 Zug Island Road
P.O. Box 33950
Detroit, Michigan 48232

Re: MID 005517198

Dear Mr. Bivone:

Your facility was inspected on October 11, 1983 to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The facility generates, accumulates and can store hazardous waste and is subject to the Act.

No violations of the RCRA generator or interim status standards were observed.

Thank you for your cooperation. Feel free to contact me at (313) 675-0860 if you have any questions.

Sincerely,

William E. Stone

Water Quality Specialist

William E. Stone

Compliance Section

Hazardous Waste Division

WES/sc

cc: Ken Burda (3)

RCRA Inspection Report

	EPA Identification Number: M I I	005513	7198
	Installation Name: Allied Cher	nical Cosp. Detroi	1 Tax Plant
	Location Address: 1200 Zug Z	sland Rd P. a Box	33950
	City: <u>Detroit</u>	State: Mi. 4823	12 1
	Date of inspection: 10/11/83	Time of inspection (from)	2:15 p (to) 3:30 p
	Person(s) interviewed	Title	Tel ephone
	Mr. Steven Bivone	Superintendent	313) 842 - 4400
		Technical & Engineering	
(3)			
		4	T. Landauer
	Inspector(s)	Agency/Title	Tel ephone
	William E. Stone	MI HWD / WAS	313) 475 - 0860
	Installation Activity (mark only on	e box)	Inspection Form(s)
	Treatment/Storage/Disposal per 4 Generation and/or Transportation		A
	☐ Treatment/Storage/Disposal (no g	eneration or Transportation	A
	☐ Generation and Transportation		B, C
	☐ Generation only		В
			С
oven	the plant produces pitch, cre tar. A solid hazardous waste is	generated from the m	anufacturing process
Wast	company classifies the waste le is placed in a 20 xl roll o	off box licensed by the	transporter Judland
Wate	ers. The box is located on a p	posted concrete pad. Th	e material is
land	filled at Wayne Disposal. They but have not accumulated oc	ey have interim status per 40 days.	as a storage
	cc: Ken Burda(3)		
	Allied	9	ee

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Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit appli</u>	catio:	n process(es) (EPA Form 3510-3) In	spection Form .	A section(s)
SOT	X	storage in containers		d d
\$02	\prod	storage in tanks		J
TOl	П	treatment in tanks		J
\$04		storage in surface impoundment		K,F
T02		treatment in surface impoundment		K,F
D83		disposal in surface impoundment		K,F
\$03		storage in waste pile		L
D81	\prod	disposal by land application		M,F
D80	П	disposal in landfill	•	N,F
Т03	Ш	treatment by incineration		0/P
. T04		treatment in devices other than tan impoundments, or incinerators	ks, surface	Q
Other activities	_			
GENERATOR	II		APPENDIX	GN
TRANSPORTER			APPENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

See January 83 report

cc: Ken Burda (3) allied

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(4-82A)

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		Section B: GENERAL FACILIE	1 3 I A I	TUARUS:	(rait	. 205 Subpart 6)
			YES	NO	NI*	Remarks
1.		the Regional Administrator notified regarding: 265.12				-
	a.	Receipt of hazardous waste from a foreign source?				NA
	b.	Facility expansion?	and of the latest and		•	NA
	C.	Change of owner or operator?	China to the Control of the Control			NA
2.	Gen	eral Waste Analysis: 265.13				•
	ā.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>×</u>	**************************************		
	Ь.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>×</u>	ghamile-digitary.	**************************************	
	C.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		,		NA do not accept waste from offsite
3.	Sed	curity - Do security measures include (if applicable) 265.14	B &			waste from on site
	a.	24-Hour surveillance?	×		-	
	b.	or i. Artificial or natural barrier around facility?	X			
		and ii. Controlled entry?	X			
	c.	Danger sign(s) at entrance?	<u> </u>	 		At HWMF
4.	Ow	mer or operator inspections: 265.15	٠			
	a.	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	X			

*Not Inspected

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b.	have	the owner or operator an inspection schedule he facility?	<u>X</u>	4		westerness and the second		*****************
C.		o, does the schedule address inspection of the following as:						
	j.	monitoring equipment?	-		***************************************	NA	girg - rossession to grow and a second	
	ii.	safety and emergency equipment?	X			Sepen	rte-Safety Protection	Dept
	;;;.	security devices?	X	vicus	Special	e-flant	Protetien	
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	X		-			4 2.
	٧٠	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	X	NIVE ASSESSED.	and the state of		1,000	and the second s
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	X			ST-100-31		
d		areas subject to spills inspect- daily when in use?	X		,			West of the second
e	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u>X</u>	······································	**************************************	Mill hallman, and provide the state hallman,		
f		s the inspection log contain the lowing information:						
	i.	the date and time of the inspection?	X	~	, 			
	ii.	the name of the inspector?	X			***************************************		-
	111.	a notation of the observations made?	X		· ·			
	iv.	the date and nature of any repairs or remedial actions?			· ·	none	e neede	6
Do pers include		training records 65.16						
ā	3. Job	titles?	X		-		·	<u>-</u>
ŀ	o. Joh	descriptions?	\sim	•				

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			YES	NO	NI	Remarks
	C٠	Description of training?	X	***************************************	MATERIAL PROPERTY.	
	d.	Records of training?	X		- Company	
	e.	Did facility personnel receive the required training by 5-19-81?	X	0+ ²⁻⁴ бликиския	Websers, opp	
	f.	Do new personnel receive required training within six months?	X		***************************************	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	X	\$		6/83
6 .	rec	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.1	17			
	a.	Special handling?	***************************************			(
	b.	No smoking signs?			VIII. 100 CO.	
	C.	Separation and protection from ignition sources?		_		-

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	Section C: FREPAREDNESS AND	D PREVE	NTION	: (Par	t 265 Subpart C)
i s	Maintenance and Operation of Facility: 265.31	۷FC	NO	NI	Remark s
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous			14 4	(Clific C C
	waste constituent?	Monthly accordate	X	a-gum.a.	
2	If required, does the facility have the following equipment: 265.32				
	a. Internal communications or alarm systems?	X	er e	Marriage section and and	
	b. Telephone or 2-way radios at the scene of operations?	X	***********	***************************************	· · · · · · · · · · · · · · · · · · ·
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination	_			
	equipment?				Account of the second of the s
	Indicate the volume of water and/or foa	am avai	lable	for fi	re control:
	2500 gpm @ 300 psi	<u> </u>	· ·······		
	Defroit Fire Station	near	by		
3.	Testing and Maintenance of Emergency Equipment: 265.33				
	 Has the owner or operator established testing and maintenance procedures 				
	for emergency equipment?	$\boldsymbol{\lambda}$			
	b. Is emergency equipment maintained in operable condition?	A.			
4			**********		
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	X			
5.	Is there adequate aisle space for unobstructed movement?	X	····		
6.	Has the owner or operator attempted to make arrangements with local				
	authorities in case of an emergency at the facility?	X			letler documenting formula to not necessary. Do give fire tours
		C=1	اسچ	- ని దామోకే దే, జున్వోల్ల	Do give fire tours

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4/82-A

•	Section D:	COLLINGENCY	PLAN AND	EMERG	ENCY	PROCEDU	RES:	(Part	265 Subpart	D)
	· ·			YES	NO	NI	Remar	ks		
	the Contingency owing informatio		the							
ã.	The actions facinust take to com §265.51 and 265. to fires, explosunplanned releas waste? (If the Prevention, Cont measures (SPCC) only to amend the incorporate haza management provisufficient to corequirements of applicable.)	ply with 56 in responsions, or any e of hazardou owner has a S rol, and Coun Plan, he need at plan to rdous waste sions that ar mply with the	e s pill ter- s	X	##MANAGEMENT		***************************************			
b.	Arrangements agr police department hospitals, contrand local emerge to coordinate em pursuant to §265	nts, fire deparactors, and Sency response mergency servi	tate teams	X	-			etter	documen	ting
c.	Names, addresses numbers (office persons qualifie emergency coord	and home) of ed to act as	all	4	V	and the state of t	a. t	Tamen	aterial is . ents not no met not not not not not not not not not no	such that econsery.
d.	A list of all en at the facility location and phy of each item on brief outline or	which include sical descrip the list and	es the otion a	X	**************************************					
ė.	An evacuation p sonnel where the ity that evacua- sary? (This pla signal(s) to be tion, evacuatio evacuation rout	ere is a poss tion could be n must descril used to begin n routes, and	ibil- neces- be n evacua-							

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

at site

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		162	NO	IN T	Kemarks
	Emergency Coordinator 265.55				
	a. Is the facility Emergency Coordinator identified?	4	WHITELEFE	Add Angle of Military and	
	b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>			
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u></u>	skes his more		
•	Emergency Procedures 265.56				
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	·	***************************************	***************************************	NA.

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	9					

					YES	NO	NI	Remarks		
٠	Use	of M	anifest System	265.71	_					
	a.	proc proc (Par the gene	the facility fo edures listed in essing each mani ticularly sendin signed manifest rator within 30 very.)	§265.71 for fest? g a copy of back to the		O ncompania		Do not waste	eccept off	-site
,	þ.		records of past sined for 3 years		***************************************	100,00400	400-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0	**************************************		**************************************
2.	req	uiren	e owner or operat ments regarding m incies? 265.72	nanifest	<u> </u>	No Appropriate to			, , , , , , , , , , , , , , , , , , ,	
of	on-s	ite 1	ole to owners or facilities that o waste from off-s	lo not						
3.	0pe	eratin	ng Record 265.7	3				_		·
	3.	mai: reco	s the owner or op ntain an operation ord as required i .73?	ng	X					
	b.	con:	s the operating nation the following ormation:							
		i.	The method(s) are of each waste's storage, or disprequired in 40 (Appendix I?	treatment, posal as	_X		·	one w manife	aste - t	fom
		† i.	The location and each hazardous facility? (This should be cross to specific manife waste was acby a manifest.)	waste within the s information -referenced ifest number, companied by	<u>X</u>	ge e-constant		one was	fe-oue	HWMF
İ	***	Ài.	A map or diagra cell or disposa							
	***		applies to disp	osai	Ε	-1				4/82-A

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

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YES NO

NI

Remarks

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Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

		the owner or operator of the	YES	NO	NI	Remarks
		lity implemented a ground- er monitoring system? 265.90		_/	_	
	If '	'no", Skip to number 11.		/		
2.	faci grou	the owner or operator of the lity implemented an alternate undwater monitoring system as cribed in 265.90(d)?	_	MUNICIPAL/USS		
	If '	'yes", skip to number 12. 'no", continue				
3.	syst	s the groundwater monitoring tem meet the following re- rements of 265.91:				
	a.	At least one well installed hydraulically up-gradient from the limit of the waste management area?		M ^O TOMAN	-	<
		Indicate the total number of up-gradient wells.				
	b.	At least three wells installed hydraulically down-gradient at the limit of the waste management area?		-		
		Indicate the total number of downgradient wells.		· • · · ·	-	
	C.	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	? 			

	•		
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Sketch the locations of the wells relative to the waste management area.

			YE-S-	-NO	ŊŹ	Remarks
	d.	Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	_	_		
4.	deve wate plan	the owner or operator eloped a written ground- er sampling and analysis n that includes procedures techniques for: 265.92				
	ā.	Sample collection?			-	
	b.	Sample preservation and shipment?				
	C.	Analytical procedures?				
	d.	Chain of custody control?	·	-	Miles (green)	
5.	fol	s the owner or operator low his groundwater sampling analysis plan?			· ·	
6.	ana	the groundwater sampling and lysis plan maintained at the ility?		work and the same of the same		
7.	min of par anc	the owner or operator detered the concentration or value all the groundwater monitoring ameters of 265.92(b) in accorded with paragraphs c and d of .92?				·

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j.						
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8.	an <u>c</u> wate	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 262.93				
	a.	Whether hazardous waste or hazardous waste constituents have entered the groundwater?		epippinejas.	_/	
	b	The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	Water		•••••	
	c.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?	7		and a second	
*9.	a s wat	the owner or operator performed tatistical analysis of his grounder monitoring data as required in .93(b)?			<u> </u>	
*10.	inc	there a statistically significant rease (or pH decrease) detected in well?			<u> </u>	٠ : -
	a.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f? Skip to number 14			<u> X</u>	
11.	wrī	the owner or operator prepared a tten groundwater monitoring waiver constration for the facility?				
	ā.	Is the waiver demonstration maintained at the facility?			Al-	
	b.	Mas the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				
Note		Inspectors should request a copy of the waiver document.				
	C.	Skip questions 12, 13, and 14.				

YES NO NI

Remarks

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*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

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<i>:</i>						

		AF 2	NO	N1	Rema	ırks		
12.	Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?			green-te-				- -
	a. Has the plan been certified by a qualified geologist or geotechnical engineer?	WORKSHOOLOO						
Note to t	e: If the plan for an alternate grounds the Regional Administrator the inspector	vater r sho	om o	nitoring request	system a copy	m was y for	not subn review.	nitted
13.	Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	-			-	KWOAJEL MANE	D4	
14.	Does the owner or operator submit reports and maintain records as required in 265.94?							

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						AF 2	NU	NI	Remarks		
1.	Clo	sure	265.112								
	ā.		the facilit n available	y closure for inspectio	on?	X	Market Angel All States	C-MS-exceptions			
	b.	Does	the plan	identify:				•			
				tent unclosed ty life?			ENTER CONTROL		wa		
		, p	maximum haventory?	zardous waste	j 1)	×	dang makhan m	and the second			
		iv.	estimated	year of closu	re?	<u>×</u>	*		THE STATE OF THE S	**************************************	
		٧.	schedule d	of closure act	ivities?	×			entropy to the state of the sta		
	с.	Has	closure be	gun?			<u> </u>	m-ci-roonso	- CONCENSIONAL -	· · · · · · · · · · · · · · · · · · ·	
2.	Pos	st-Cl	osune <u>26</u> 5	.118				The second second second			
	a.		the post-cl inspection	osure plan av n?	ailable		/				
	b.	Doe	s this plar	n contain:					₹ ,		
		ì		on of groundwa gactivities a es?		SANDANSSAMI.		The second			
		ii.		on of maintena and frequenc							
		/	/ cove	grity of cap, r, or containm ctures, where e	ent		800 - 41 - 5	-			
				lity monitorin	g equip-						
	/	iii.	of person	ress, and phon or office to st-closure car	contact	}		enter symbols			
	С.	Has	the post-	closure period	begun?		m-n	· · · · · · · · · · · · · · · · · · ·	BANES	Pakinda da mangangangan ng mga mga mga mga mga mga mga mga mga mg	
	ď.		the writte imate avai	n post-closure lable? 265.1			·		n-make-make-make-make-make-make-make-make		
5	plie	s onl	y to dispo	sal facilities	•	: . G]			4/8	2-A

Section G CLOSURE AND POST CLOSURE (Part ^65 Subpart G)

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Section I - UST AND MANGEMENT OF CONTAINERS (Pa. 265, Subpart I)

		152	NU	NI	kemarks
١.	Are containers in good condition? 265.171	Ł.		***************************************	roll-off box
2.	Are containers compatible with waste in them? 265.172	<u>×</u> .		- Charles - Char	
3.	Are containers managed to prevent leaks? 265.173	*	warengen on	87 <u> 8 80,000</u> 5-	
4.	Are containers stored closed?				roof over HWMF
5.	Are containers inspected weekly for leaks and defects.	×	waanadii wa 22 da 45 h	ما المارية الم	is to be completed by 11/83.
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.776	#*************************************	***********	NA
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	· ·		********	NA
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				NA

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Section J - TANKS (Part 265, Subpart J) Remarks YES NO NI 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the ... tank? 265.192 Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? Do continuous feed systems have a waste-feed cutoff? Are waste analyses done before the 265.193 tanks are used to store a substantially different waste than before? Are required daily and/weekly inspections done? 265.194 Are reactive & ignitable wastes in tanks protected or rendered non-

7. Are incompatible wastes stored in separate tanks? 265.199
(If not, the provisions of 40 CFR 265.17(b) apply.)

265.198

reactive or non-/gnitable?

treatment requirements.)

Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity:	gallons			
Tank diameter:	feet			
Distance of tank f	rom property line		feet	
	hrough 2 - 6 of NFPA's	: "Flammable and	Combustible	Liquids

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Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	,	YES	NO	NI	Remarks
T .	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	RATION CONTRACTOR OF THE PARTY		/	
2.	Do earthen dikes have protective covers? 265.224	***********			
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225			Q-mayleyorlesszer	
4.	Is the freeboard level inspected at least daily? 265.226				
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	***************************************	erryr consistency	CONT. Company	
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229				
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				•

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Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		152	NO	14.7	Kemarks		
	Are waste piles covered or protected from dispersal by wind? 265.251	F34504-500453	WARRANCE COMMISSION OF THE PERSON OF THE PER		***************************************		4
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	<u>-</u>		CASTANIA AND THE STREET, SANS		and the second s	
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	_		· · · · · · · · · · · · · · · · · · ·			
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256						,
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?		***************************************		-		
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257		·				
7./	Are piles of incompatible waste protected by barriers or distance from other waste?	- 10 mm-20				70°	

Section M - LAND TREATMENT (Part 265, Subpart M/

	•	YES	NO	ΝI	Remarks	
1.	Is treated hazardous waste capable of biological or chemical degradation? 265.270	direct in th	-	_/		
2.	Are run-off and run-on diverted from the facility or collected		/			
3	Is waste analyzed according to 265.273?			A-VINCATOR ACTOR	a	
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	/ 		Management		
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278					
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	- Laborni - Tu	* <u>***********************************</u>	***************************************		
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279					
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281					
9/.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	was				



	•	CLIOIII	- LANUF	IFF2	(rart	200,	⊿bpart N)		
				YES	NO	NI	Remarks		
٠		eral Operating Requirements s the facility provide the fol	265.302 lowing:						
	a.	Diversion of run-on away from active portions of the fill?	i		movelosovaminio	Water		The state of the s	The state of the s
	b.	Collection of run-off from ac portions of the fill?		kanatanakanatr	RETURNS			70000	
	С.	Is collected run off treated?				_	to recognize the second		
	ď٠	Control of wind dispersal of hazardous waste?			\angle				······································
2.		veying and Recordkeeping 265 s the Operating Record Include	5.309 e:						
	à.	A map showing the exact locat and dimensions of each cell?	ion					The state of the s	- tree
	þ.	The contents of each cell and location of each hazardous watype withing each cell?				- 14-1111+	,	Marina da antigara da antig	
3.	rea act mix act	cial requirements for ignitable citive waste. Are ignitable or ive wastes treated so the resisture is no longer ignitable or ive? (Indicate if waste is ignited the contraction) 265.312	re- ulting re-					· · · · · · · · · · · · · · · · · · ·	~~~
4.	Spe Was	ecial Requirements for Incompa stes. 265.373	tible						
	of cel	es the owner or operator dispo- incompatible waste in separate lls? (If not, the provisions of CFR 265.17(b) apply.)	е						

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

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- 5. Special requirements for liquid waste 265.314
 - a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.
 - i. Does the landfill have a chemically and physically resistant liner system?
 - ii. Does the landfill have a funetional leachate collection system?
 - iii. Are free liquids stabilized prior to or immediately after placement in the landfill?
 - b. Have containers holding free liquids been placed in landfill since March 22, 1982?
- 6. Special requirements for Containers
 Are empty containers crushed flat, 265.315
 shredded, or similarly reduced in volume
 before being buried beneath the surface
 of the landfill?

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		C.			
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<u>Det</u>	ermination of Steady State I=incinera		ermal /	Part 265, Subparts 0 and P)
а.	Type of unit (i.e., type of incinera			reatment):
b •	Components and steady state condition	/		265.373
	Was each component at steady state p Component	YES NO	NI	Remarks
			EVINDALIA VIDE	
Wa:	ste Analysis I 265.345 T	265.375		
₫•	Minimum requirements for wastes not previously burned/treated.			₹ •
	i. Required analyses; has an analysis been performed for the following?			
	Heating value	жанаатын үн жанаандабай	80 1 am - 1 22 2	
	Halogen content			
	Sul∱ur content			
	ii. Has documented or written data been substituted for analysis of either:	ANALOS VARIABLES		
	ii. Has documented or written data been substituted for analysis			

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	b.	List other paramters for which the waste establish steady state or determine the (Note in Remarks any which you feel shou	types	of	pol	llutar	able owner ats which m	or opera ay be eπ	tor to mitted.
3.	<u>Mon</u>	itoring and Inspections I 265.347 T 265.37	YES	NO		NI	Remarks		
	à.	Are combustion/emission control instruments monitored at least every 15 minutes?	_	<u></u>	ado:				·
	b.	Is steady state maintained or corrections attempted?			=20 ,			······································	
	c.	Is stack plume observed at least hourly for normal color and opacity?			_	gi		CONCESSION OF THE SECTION OF THE SEC	
	d.	Did any stack observations made by owner or operator show a plume different than normal?**	/			phillipsympology.		, , , , , , , , , , , , , , , , , , ,	
	e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**				 			·····
	f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?		E-1-000-E-3					
		ecify in Remarks for what period of time is was checked.					•	÷	
	9.	Are emergency shutdown controls and system alarms checked daily for proper operation?			,		· <u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>		
4.	<u>0p</u>	en Burning /T 265.382 (open burning does n	ot ap	ply	to	incir	neration)		
	a.	Only complete this part if the facility open burns hazardous waste.							
		i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).							
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ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum dista burning or de property of	tonation 1	
0 to 100	204 m 380 m 530 m 690 m	670 1,250 1,730 2,260	ft ft



Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

		YES	NO	NI	Remarks
].	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401		-	/	
2.	Is a continuously fed system equipped with a means of hazardous waste inflow—stoppage or control (e.g., cut-off system)?		_		
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	_			
4.	Are inspection procedures followed according to 265.403?				
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	ALLES AND			
6.	Are incompatible wastes treated? (If was 265 17(h) applies) 265 406				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

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S	ect	i	on	Α:	Sc	ope
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 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

			YES	NO	NI	Remarks
(1)	Doe:	s the operator have copies of the manifest ilable for review? 262.40	1		***************************************	
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	4		16 yds	per shipment
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21		6	Hauler Disposer-	per shipment -Inland Waters - Wayne Disposa
	ð٠	Manifest document number?	X	· *		
	ь.	Name, mailing address, telephone number, and EPA ID number of Generator	上		<	
	Ç.	Name and EPA ID Number of Transporter(s)?	土		_	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u>x</u>	***************************************	***************************************	
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	土		· ·	
	f.	The total quantity of waste(s) and the type and number of containers loaded?	X.		······································	
	g.	Required certification?	X		****	
	h.	Required signatures?	<u>X</u>		-	
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility we ment.	e gene	erat	or has N(OT received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	numbe 2.42)	er f to	or which the Regio	the generator Onal Administra-

<u>Sect</u>	ion	C: PRE-TRANSPORT REQ (EMENTS (Part 262, Su	bpart H	C)		
1.	with (Req	vaste packaged in accordance DOT regulations? uired prior to movement of rdous waste off-site) 262.30	YES	NO ——	NI	Remarks
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations erning hazardous waste materials? quired for movement of hazardous				•
	wast	e off-site) 262.31 262.32		***************************************		, to the second
3.		required, are placards available to asporters of hazardous waste? 262.33	X		Outside	
4.	wast with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac n 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Rev	cility restri ion A, n B, co ision	[265] icts check omple	.l(b)] all acc < this te the	or (B) in accordance cumulation to tanks box and skip following observa-
	â∙	Is each container clearly marked with the start of accumulation date?	Ho	Wevi	er, c	re complying as generator
	b.	Have more than 90 days elapsed since the date inspected in (a)?) 	
	С.	Do wastes remain in accumulation tanks for more than 90 days?	**************************************		· · · · · · · · · · · · · · · · · · ·	NA
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	×		, <u></u>	
Sec	ction	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpa	rt D)		
generate ()	nee mir	e all test results and analyses eded for hazardous waste deter- nations retained for at least ree years? 262.40	YES	NO	NI	Remarks
Sec	ction	E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	opart E	:)		
1.	Has	s the installation imported or ported Hazardous Waste? 262.50		. <u>X</u>		
		answered Yes, complete the following applicable.)				
	ā.	Exporting Hazardous waste; has a generator:				

		· · · · · · · · · · · · · · · · · · ·
*		
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		·	YES NO	N⊥	Remarks	
1 years		ified the Administrator in ting?	/ <u> </u>	Bad May Spring.		
	4 pm 6	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?				,
	ำำำ.	Met the Manifest requirements?	MARKOPANIARO VIIIMANYMARIA		WILLIAM TO THE PARTY OF THE PAR	
b.	the	rting Hazardous Waste; has generator met the manifest irements?				

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WILLIAM G. MILLIKEN, Governor

1325

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Hazardous Waste Management Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

January 10, 1983

Mr. Steve Bivone
Superintendent, Technical & Engineering
Allied Chemical Corporation, Detroit Tar Plant
1200 Zug Island Road
P.O. Box 33950
Detroit, Michigan 48232

Re: MID005517198

Dear Mr. Bivone:

URAL RESOURCES COMMISSION

JACOS A. HOEFER

CARL T. JOHNSON E.M. LAITALA

HILARY F. SNELL HARRY H. WHITELEY

JOAN L. WOLFE

CHARLES G. YOUNGLOVE

On January 4, 1983, your facility was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The facility generates a hazardous waste, waste crossote, and is subject to the Act.

No violations of RCRA were found during the inspection

Thank you for your cooperation. Please contact me at (313) 675-0860 if you have any questions.

Your truly,

HAZARDOUS WASTE MANAGEMENT DIVISION

William E. Stone

Water Quality Specialist

William E. 5 Lone

WES/sc

cc: Al Howard (2)

MICHIGAN THE GREAT LAKE STATE RECEIVED

JAN 14 1983

ACT 64

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RCRA Inspection Report

EPA Identification Number: $MIII$	005517	7198
Installation Name: Allied Chem	rical Coop Detroit	Tav PH.
Location Address: 1200 Zuc	Island Rd. (P.O.	Box 33950)
City: <u>Defroit</u>	State: Mich.	48232
Date of inspection: $1/4/83$	Time of inspection (from) _	1:30 (to) 4p
Person(s) interviewed	Title	Tel ephone
Steven Bivone	Superintendent	313) 842-4400
·	Technical and Engineering	
Inspector(s)	Agency/Title	Tel ephone
William E. Stone	MIDNR-HWD/WGS	313)675-0860
Installation Activity (mark only one	e box)	<pre>Inspection Form(s)</pre>
Treatment/ <u>Storage</u> /Disposal per 40 <u>Generation</u> and/or Transportation	O CFR 265.1 and/or	. А
	eneration or Transportation)	A
\prod Generation and Transportation		B, C
☐ Generation only		В
		C '

CC: al Howard (2)

JAN 14 1983 ACT 64

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		44

RCRA Inspection Report

Allied Chemical Corporation Detroit Tar Plant 1200 Zug Island Road Detroit, Michigan 48232

MID 005517198

The facility produces pitch, creosote oil and mapthalene oil from coke oven tar. All waste (K035,u051) is solidified process spill residues. The waste is placed in a 20 yrd. roll off unit, accumulated (so far, always less than 90 days) until unit is full and then taken to Wayne Disposal by a licensed hauler.

sc

cc: Al Howard (2)
Allieb

STATE IDENTIFICATION NUMBER (If Applicable)

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A - General Facility Standards

I. General Information:

(A)	Facility Name: Swied Chemical Corp. DETROIT TAR PLANT
(b)	Street: 1200 Zue Island Road
(C)	City: Demoir (D) State: Micn. (E) Zip Code: 40232
(F)	Phone: 313-842-4400 (G) County: WAYNE
(H)	Operator: Some ALLIED CORRELATION, ALLIED CHEMICALS Co.
(1)	Street: P.O. 1/37 R.
(J)	City: MOREITTOWN (K) State: New JERSEY (L) Zip Code 07960
(4)	Prione: 455-5000 (WATIS LINE) (N) County: Moners
	Owner: Same as Operator
	Street:
(V)	City: (R) State: (S) Zip Code:
(T)	Phone: (U) County:
(V)	Date of Inspection: Dec. 8, 1981 (W) Time of Inspection (From) z:15 P.M. (To) 4:50 P.M.
(X)	Weather Conditions: 30%, STEADY WIND LIENT JNOW OVER CAST

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(Y)	Person(s) Interviewed	of the second	Telephone
£ " \$	Mr. Kennery BOCKOLORS	PLANT MANAGER	313-842-1400
	and the second second	PROCEST EMBINEEL ENVIRONMENTAL	Zerra mengembangan mengangan mengangan mengangan mengangan mengangan mengangan mengangan mengangan mengangan m
	ME STEVEN BINGUE, SUFFERISCE	TROUBLE ENHORMENTALE ARG. SERVICE	IS SAME AT REOVE.
	Carbonines son the latest to be between the converse and will be to require more than the best but the latest	The state of the s	real till tiller om annammen skappanen men en e
			ormen i som eldermeden rademaden en ledder i VIII daddaddadd beken i daddaddadd beken leddadd beken beken beken
171	Inspection Participants	Agency/Title	Telephone
(am)	·		•
	SOUTH NORTH AND PROPERTY	LEWIS RESOURCES, WATER QUALITY DIVIS	10N 3/3-3/Q-962 com
	WILLIAM STORE "	A STATE OF THE STA	es A si
	Commission to the Marian Applies Affiliation of the commission of	The second secon	, том Дустинго мога не ф-чанивширатори с о верхия с ринники тиристра тилосору к Дусты жили док Д (с раз
			vaza i e evruzuer e e ezit e a zemeszizonatok ezenetnek var aza v zementekuntungezen (lg - e zementeka kill) eget kilde
(AA)	Preparer Information		
	*	Summary 1 Think I m	
	Name Jusan Norton	Agency/Title	Telephone
	and the first and the constraint of the constrai	ocenia – valilleike kalenia aillittiisiin nee kalenkiliiniiniin oo noomanee variin miinaavaanon	Andrew - week annual Indianal addition and an arrangement and a second
		II. SITE ACTIVITY:	
	Complete continue I through VI	II for all treatment, storage, and	Any disposal
	facilities. Complete the form	us (in parenthesis) in section VII	I corresponding
	to the site activities identif	fied below:	
X	A. Storage and/or Treatment	D. Incineration and/o	r Thermal Treatment
et a Austriaco	Containers (1)	(O and P)	
	2. Tanks (J) 3. Surface Impoundments (K	No. of the second secon	
	4. Waste Piles (L)	X E. Chemical, Physical	, and Biological
	,	Treatment (Q)	and the second s
2	ม. Lanu Treatment (M)	FOR WASTEWATER ONLY - TI	
	t. Landfills (N)	SANTALY SEWER, PRESENTE	
D-C-WEST MARKS	The state of the s	PRODUCTION." (40CFR 76	
			, ~,)

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Note:

If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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111. GENERAL FACILITY STANDARDS: (Part 265 Subpart 6)

			Yes	No	Mary Sund	Remark	
(A)		the Resional Administrator notified regarding:				*	
	Process St.	Receipt of hazardous waste from a foreign source?	40000000000000000000000000000000000000	95abre 1480 villa (1664	Enterol Reproduction of	romania MOS ASSU CABUL	omental de la constante de la
	2.	facility expansion?	our-se Perilification and	Allefant of Section Communications	Fillings (Un-richter) (Ser	NOTAPELICABLE	emony (special)
(b)	Gen	eral waste Analysis:					Š
	oble to	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	NV CHESTON OFF.	Approximenta PET Suprose	JES-ANNISAS AMBRICA	м-дейлет-ти-обильна-менерительного де обосновником польмерт не пременерительного учествення в пременерительного дей-	er vizaun
	2,	Does the owner or operator have detailed waste analysis plan on tile at the facility?	V.	ча такій і «Этікішт»	Mannalista activista	uzannoch hada ni sau za 200 ez u ni shanka e mad a cizantak Badan saunda tes e a lish ka emin isi ili khanka k	2002-2007-88U
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		мындэштүгчж	A45% श्रीकृतिस्थानेतृत्वसम्बद्धाः	NOST BPLICABSE	nodrasiillos
	Sec	curity - Do security measures include (if applicable)	% 8 ₩ \$: ::
	,	24-Hour surveillance?	X.	Nacional and Section 1985.	**************************************		Schlem@Blacke
	2.	Artificial or natural barrier around facility?	oli Seguman	«манийосной»(кака»	ವಾಸವರಾಗ್ ಸ್ರಮ		sovenski
	3.	Controlled entry?	X	To the control of the	Algebra (displicate pro-	ченный каки температуру принципальный принци	wannikonik
	4.,	Danger sign(s) at entrance?	Ladiarrenia	enachtornostru)	+anditationneedse		Resignation services
()		Owner or Operator Inspections				•	
	· *	Records of malfunctions?	egam/spedallimenter	очно (Дайовория	CONTRACTOR MARKET AND	No PARLEAS SO FAR, THELEPARE HI	3 T July incommunica
	2.	Records of operator error?	to an adjustance to the	DOMESTICAL.	4122471222354-44-5	is 1	S.
	3.	Rcords of discharges?	in the second se	encoderrencia inco-	- Constant of the Constant of	to the second se	nomanienie

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III. GENERAL FACILITY STANDARDS - Continued

			Yes	No	NIK	Remarks	
	4.	Inspection schedule:	y managementa	War Sharman gera	www.egibs.com/15.11(E)26	Hallacide, maggation makes or Allian or the classical standards or Antonia particular of Alliandrical and control	weensware and the
	Ed a	Safety, emergency equipment?	1	Doy-yo-Energy opening	©-\$-114 man-186 m}-@	d.	n-Successive and Geology
	6.	Security devices?	Ă.	standalism constituti	ensuppose and		indute Algertalist; (Sedengg)
	7.	Operating and structural devices?	SOME PROPERTY AND ADMINISTRATION OF THE PARTY AND ADMINISTRATI	MONOCOLOGIA PARAMETE	imas das Transcompto de		g-acromamas/asyms-
	8.	Inspection log?	an Lance,	\$454500AP10006ee0jyPt	четора-4110Уундау	whethere we will consider a constant of the state of th	эмесмоксол-саци
(L)	Uo inc	personnel training records luge: (Effective 5/19/81)					
	Process 40	Job Titles?	<u> X</u>	messeemsemsems/h	Obstant N. Walleyes	стамить на открыть неживается бастам («А) «А) ««Онеческого на объементем нежимающих формунованнямий» формунай на объементем нежимающих формунованнямий объементем нежимающих формунованнями объементем нежимающих формунитем немимающих формунитем немимем немимем немимем немимем немимем немимем немимем немиме	INGENERALIS GEORGEAN
	2.	Job Descriptions:	Χ.	WARREST AND SOLVE	Josephilik Colonia		granmenensierrikko.
	3.	Description of Training?	X	97-mpo.//spec.	will-democracies	Ass to the contract of the con	నీడిప ి ంకట్కు <u>లు</u>
	4	Records of Training?	<u> </u>	Owner of the Control	ou <u>mage</u> of Fallows	Albert Princes on Market Strategies, of Market Strategies, and an experience of the Albert Strategies, and the Albert Strategies,	West Control to Address Control
	5.	Have facility personnel received required training by 5-19-81?	X.	Moderne	Manifestation (Soldanization 1	**************************************	VALANTEET PROCESSES ASSISTA
	6.	Do new personnel receive required training within six months?	nostración de la compansa de la comp	түншиучу минен а	r formander de vertrate est	That gar you will distribute an weap 170 454 with a to company 444 or conversely any 2004 in this Assence of garden bendering designed	in the second section of the second section is a second section of the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the second section in the second section is a second section in the section in the section is a section in the section in the section in the section is a section in the section in the section in the section is a section in the section in the section in the section is a section in the section is a section in the section is a section in the section is a section in the section in the section in the sectio
, comment by a second by a sec	rec	required are the following special uirements for ignitable, reactive, or compatible wastes addressed?	à.				
	grande &	Special handling?	a continue of the	MAI Sauce adoption	Физичентерину	uudhatkaayilikkilokikkaalitiikkaalikkilokitiktiinurussuumaruussuumaansussa	netro estatutado de Participa de Calendario
	2.	No smoking sighs!	Nobel P. P. Salvanova	ಸಾವಾಯಕ್ಕು ಕ್ರಾಪ್ ಸ್ಟ್ರಾಪ್ ಸ್ಟ	, minday is management	ng Ny	
	Ĵ.	Separation and protection trom ignition sources?	455000 e566600	turneg@Geal/fatitio	eponettiitekeettiikeettiis	economic substitution and committee that the committee of	

^{*}Not Inspected

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IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

The state of the s	Maintenance and Operation of Facility:	Yes 1	IO NI	REMARKS,
	1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	N. Salamanan sun	glove-morale special graphs	CHUY MINICE SPULSEE TO CHECKE PAS BY CONTAINER - A SINCE TO CU YARD BOX WATH OPEN TOP
(6)	If required, does the Facility nave the Following Equipment:			
	internal communications or alarm systems?	A American	Magaineactus vary efficiency in any	hand (Section 2008) and a relative section of the s
	2. Telephone or 2-way Radios at the scene of operations?	radiodrinae cae	zantona niigi-	CONTENTO POR CONTENT OF SERVICE AND ANALYSIS CONTENTS OF SERVICE CONTENTS OF SERVICE CONTENTS OF SERVICE AND ANALYSIS CONTENTS OF SE
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	· .		
	Indicate the volume of water and/or	foam availa	ble for f	ire control:
	Units: Z500 GEM AT APPROX. 300	2324 LEWILLEN	Sand allegran Salas Latin Sanash	FORM IS AVAILABLE FECH CITY OF
	DETROIT - SOURCE 15 3 BLOCK	,	hagan proceedia and a second and	
(C) _.	Testing and Maintenance of Emergency Equipment:			
	1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	<u> </u>	OSSENDO DE MANAGEMENTA ANTONO	
	2. Is Emergency Equipment haintained in Operable Conditions?	n Hanner an	valuaristings valuaristings	
(0)	Has Owner or Operator Provided Immediate Access to Internal Alarms (if needed)	? <u>X</u>	- Marinana	

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A)		s the contingency Plan contain the lowing information:	Yes	NO	Almost Signature	Remarks
	The state of the s	The actions facility personnel must take to comply with \$265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	K	Quega-menones		COMPANY HAS SPICE ALSO; THIS IS KEPT SEPARATE FROM ECRA CONTINGENE PLAN
	2. =	Arrangements agreed to by local police departments, fire departments nospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	Ann, pickason (sour Ash	Laure	www.db/2014enfry	ARRANGEMENT FORM HAS BEEN DRAFTED NO OFFICIAL CONTACTS HAVE BEEN
		Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	Lam	чүүдүйгийчийги	resuscentiaries.	n valor of the second s
	Ly a	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a prief outline of its capabilities?	Lineanus	www.militeus/ciffida	Napaga jumah delikilik ya	
-	5 .	An evacuation plan for facility personnel where there is a possibilithat evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	ty X			

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

		Yes	No	W. T. A.	Kemarks
	Are copies of the Contingency Plan Available at Site and local Emerge Organizations?				SITE 485; DEGANZATIONS NO
(U)	Emergency Coordinator				
	l. Is the facility Emergency Loordinator identified?	Ž	en manusisana	druktitieriko test:	** Expression for the season define the resource and the contract of the contr
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u> .	005- 000-105-10125-113	» montalestaboras.	established to the transfer of the second of
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		note situationesi	ij uprodjelinikanojcija	- Part of the Annual to the information are Annual to the form of the control and the annual section and the information depression and define an annual to the control and th
(U)	Emergency Procedures				
	If an emergency situation has occurate this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	e y	BOOK) OPERSONSEEINE	ог окамескателен.	NOT APPLICABLE; NO EMERGENCY
	VI. MANIFEST SYST	TEM, RECUR art 265 Su			REPORTING
		Ye	s No	Security Security	Remarks
(A)	Use of Manifest System				
	1. Does the facility follow the procedures listed in §265.71 processing each Manifest?		r Ordritis standillorddoc	e waaday esser	
	2. Are records of past shipments retained for 3 years	X.	PA-OC STOPPERSON	NGO WASSELVANION SHEET	
(a)	Does the owner or operator meet requirements regarding Manifest Discrepancies?	жермасс	AUDADO 4EEEMAAA GAAA	in spanjenjalija,	ABT APPLICABLE

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VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

						150
)	Operati	ny Recora				
	mai rec 265 2. Doe con	s the owner or operator ntain an operating ord as required in .73? es the operating record stain the following ormation:	<u>X'</u>		and generalized	COMPANY HAS RECORD OF WHAT IS DISCAME TO CITY SEWER (WASTEWATER FROM CRECSCIE PRODUCTION), AS WELL AS DISPOSAL OF SOLID WASTE T CONTRACTED LA FILL
	*****	The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?	X		ECONOMISSION	
	C.	The location and quantity of each hazardous waste within the facility?	X	number of the control		
	***G.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.)	<i>Y</i>		¥2	NOT APPLICABLE
	U.	1	×			
	f.	Reports detailing all incidents that required implementation of the contingency plan?	2) Applification	ng Communication	Negativecom	NOT APPLICABLE
	5.	All closure and past closure costs as applicable? (Effective 5-19-81)	X	ner) Kanagasistan	S. Commence of the Control of the Co	

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^{**} See page 33252 of the May 19 , 1980, Federal Register.

^{***} Unly applies to disposal facilities

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VIII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

			Yes	No	NI*	Remarks
(A)	Clos	ure and Post Closure				*
	1 0	Closure Plan Available for Inspection by May 19, 1981?	X	Nagarations.		
	2.	Has this plan been submitted to the Regional Administrator		X	Secretarion	
	3.	Has Closure begun?	M	X	-	
	4.	Is closure estimate available by May 19, 1981?	X	total accessory.	************	
(B)	Post	: Closure Care and Use of Property				
	a Po	the Owner or Operator supplied ost Closure Monitoring Plan May 19, 1981)?	_	X	D15	NOT APPLICABLE LITHOUGH THE FACILITY APPLIED AS A POSAL FACILITY, THEY DO NOT QUALIFY WISE TREATED WASTE DOES NOT REMAIN
Eac	111+v	Namo: Anna Currucas Care Demost 7			TAINERS	DEFINITIONS OF DISPOSAL & DISPOSAL FACILITY " (p33068).
rac	incy				to of I	nenaction. Dec a leas
		There is not the control of the cont		No No	te of I	nspection: Dec. 8,1981 Remarks
	1.	Are containers in good condition?				PREMARKS ONLY I CONTAINER IS USED, AND
						Remarks
	2.	Are containers in good condition? Are containers compatible with				PREMARKS ONLY I CONTAINER IS USED, AND
	2.	Are containers in good condition? Are containers compatible with waste in them?			NI*	PREMARKS ONLY I CONTAINER IS USED, AND
	2. 3. 4.	Are containers in good condition? Are containers compatible with waste in them? Are containers stored closed? Are containers managed to prevent			NI*	Remarks ONLY I CONTAINER IS USED, AND -TOP 20 CUBIC FOOT METAL BOX

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7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance? 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?		* Remarks	No NI*	¹ / ₂	
wastes separated or protected from each other physical barriers or sufficient distance? J TANKS NOT APPLICABLE Facility Name: 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement	om bester state of the state of	nem and the San	SUPERSONAL TO POST CONTROLS	separate containers? (If not, the provisions of 40 CFR 265.17(b)	7.
Facility Name: Date of Inspection: 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement	one man vocanes en constante esta esta esta esta esta esta esta es	s de la companya del la companya de	Namint Andyrings visions and discovery.	wastes separated or protected from : each other physical barriers or	
 Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement 		PFLICABLE	- NOT APPL	~	
wastes which will not cause corrosion, leakage or premature failure of the tank? 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement	antibola kaji koliji. Johanni va prija njiji maja 2000-angababababa et ete diginala de objekti.	Inspection:	Date of Ins	No. 1700.	Facility
60 cm (2 feet) of freeboard, or dikes or other containement				wastes which will not cause corrosion, leakage or premature failure of the	general states of the states o
			-controllation allegates - Normal device accession.	60 cm (2 feet) of freeboard, or dikes or other containement	
3. Do continuous feed systems have a waste-feed cutoff?	- And Lithermoon of Recognition of State (Co. 1921) (1921)	same and the same same and the	#POSICELEGICONO CERTIFICAÇÃO		3.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?			PPENDININANS CATARONICO	tanks are used to store a substan-	a,
5. Are required daily and weekly inspections done?	TMADS in which we have been received an experience of the control	TOORD ATTACABLE CONTINUE TO A CONTINUE OF THE ANALYSIS OF THE	- United Acceptance of the Acc		£
6. Are reactive & ignitable wastes in tanks protected or rendered non- Indicate if waste is: II Ignitable reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)		waste is: LI Ignitable [] Reactive	cate if wa	in tanks protected or rendered non- 7 reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment	6.
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	THE BOTTOM STATE OF THE STATE O	entition of color or color of all the state of the depth was an institution for a state of the color or color of the color	issansy (skalla) (dys. dhawana sissansy , , ,	stored in separate tanks? (If not, the provisions of	7 4

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		25.		
		19		

Yes No NI* Remarks

Ö.	has the owner or operator observed Associations buffer zone requirement or reactive wastes?			- 57.7
	Tank capacity:	gallons		
	Tank diameter:	TO CO T	6	
	Distance of tank from property line	definicional de monographiques approprietation de la contraction d	feet	
	(See table 2 - 1 through 2 - 6 of 1 Code - 1977" to determine complia		nbustible	
	SURFACE	K IMPOUNDMENTS — MOTAPPUS	24.61.E.	
Facility	Name:	Date of Ins	oection:	asononas valor
general de	Do surface impoundments have at least 60 cm (2 feet) of freeboard?	евитемических тенфитератизм бамейскийский верейскийскийский сельного са	anne de la companya	owidel.iveggen
2.,	Do earthen dikes have protective covers?	перументую преспасаван мереформы чинальн	1884 Тен-так эндей интеритетитетите интереструк-тейинден интеритет	kheenzooonkei
Š. 6	Are waste analyses done when the impoundment is used to store a substantially different waste than before?	«кампонаропи» «Кайандампония», честапана-поко «каданда»	ambabah ngakan mengangan kalabangan mengapangan kanyak ngakangan pengangan dipunjak sa mala	2008-400 in 1802 vol. 18
4	Is the freeboard level inspected at least daily?	ельнайтайны «айнтепенне «нейстиков»		MENERALISINES (CONTRACTOR SE
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	ANTERESTENCES CONTROLLES INSTITUTION INSTITUTION WATERSHAMENS	е 224 кажения по поточения по	ilizonecenneu et tuturo
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	Gazdioli Itaanin Alkanganny Nelletiniaan muuta	e e e e e e e e e e e e e e e e e e e	fillmostenérel hausie
To the second	Are imcompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)			
		omisuopauten umasumistotia, nimisuminesto, assegnasipaassisto	z indizazi ian manan ngagapan natalah Azalia karan a a mangan manan karanasa karanasa ana ana dalah n gaga	المراجعة الم

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WASTE PILES - NOT APPLICABLE

Facility	Name:		en de la companya de	Date of	Inspection:
		Yes	No	NI*	Remarks
1.	Are waste piles covered or protected from the wind?		dividilinande	Prifferentiams	
2.	Is each in-coming movement of waste analyzed before being added to the waste pile?		-	Ministeren	,
3.	Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	Strafement 10		-	
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	In	dicate	if waste	is: DIgnitable, D Reactive
5.	Are piles of reactive or ignitable waste protected?		AMPLICATION	-	
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)		-		
7.	Are piles of imcompatible waste protected by barriers or distance from other waste?				

LAND TREATMENT - ADT APPELICABLE

FAcility	Name:	Date of Inspe	and the second of the second o	delica-delicaretas (trassimos) (trasimos) (trassimos) (trassimos) (trassimos) (trassimos)
Year of	Is hazardous waste capable of biological or chemical degradation?	MINISTERATORIS VARIABANINAN MINISTERATORIS		et europainen kantalantaila kantalantaila kantalantaila kantalantaila kantalantaila kantalantaila kantalantail
2.	Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?	emblassembleren somhelm (Smrk), melasssonsky		
50g 42° 11	Is waste anal yzed a ccording to 265.273?	nempero 1828to - Malanesiana con constructo est	errore March - Africa (assumente com es - antre souther our - antre souther - antre southe	MERITANIA kakabahan Kelendaran Mengani pengangan pengakan Dawa
E. v	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	<i>малениет</i> . «подальные чильнали», п		arkklan slumourmanopout dikkkovy gravyvano
5.	Is an unsaturated zone moni- toring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	такобабайда чериништеге предалагатор, п		- Indicator (Ind. Co. False - Market (Indicator (Ind. Co. False - Indicator (Ind. Co. False - Ind. Co. False - Ind. Co. False - Indicator (Ind. Co. False - Ind. Co. Fals
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?			
7,,	Cation dates, and rates, quantities, and locations of all hazardous waste placed in the facility?	этогогорийн Энгээн ийн харагаар гэр гэр гэр гэр гэр гэр гэр гэр гэр гэ	TRANSPORT OF THE PROPERTY	
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?	Indicate if waste	is: al Ignitable	a leastiv
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)			

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N LANDFILLS - NOT APPLICABLE

Ĉ		/ Name:	Da:	te of	Inspect	a company of the comp
			Yes	No	e de la companya de l	Remarks
Section 1		ral Operating Requirements the facility provide the following:				
	M. M. Color	Diversion of run-on away from active portions of the fill?	Signary commences	NTSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSSS	herennene.	THE MINISTRAL BESTON THE COLUMN THE STATE OF
	水水2。	Collection of run-off from active portions of the fill?	«Exaction reverse»	Wording partition A	Autonomora (1950)	
	**3.	Is collected run off treated?				$thm:control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_control_c$
	A.	Control of wind disposal of hazardous waste?	ne Lindberger von de	1942-0880000 miley	49'44'D-hotezzun	activities has were removed in a constitution of the constitution
		(**Effective 11-19-81)				
(8)		eying and Recordkeeping the Operating Record Include:				
	\$3000 B	A map showing the exact location and dimensions of each cell?	on and the second se	angegye zaminika ya	2012-00MNOSHPM2	
	2.	The contents of each cell and the location of each hazardous waste type withing each cell?	ФФийоголипрул	eli conjusti in internati	METANSIA GUNUNG	**************************************
(C)		ure and Post-Closure				•
	de d	Is the Closure Plan available for inspection by 5-19-81?	чиштенниций	- Manyeron magaphanis	##Poolsements*	ethermouncement the resource access of many resourcement of the access many high his literature on the confidence in the
	2.	Has this plan been submitted to the Regional Administrator?	Ф.Инашедентеритич	, GENNERBYGG-ELING	ಧಾರ್ಥಗಾಯಗಾಂತಿಗೆ	****duce years 4-filocom company, of the confidence of the confide
	3.	Has Closure begun?	00000000000000000000000000000000000000	• #####################################	**************************************	«Этерингин да у Эшин така», «Диндингингин мүү так такажа», «Дин ишилүү» үйгийн мөө түүтийн уууун дууруу дуугуу
	Ğ,	Is Closure cost estimate available by 5-19-81?				
(0) Spa rea	cial requirements fro ignitable or active waste				

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?

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NOT APPLICABLE

		Marin Jacob Comment	Yes	No	NI*	Remarks
	or r	waste is rendered non-reactive non-ignitable see treatment irements)				
	If rappl	not, the provisions of 40 CFR 265.17(b y.	**************************************	ent resident de compet	**Allenhässorbhyerutta	
(E)	Spec Wast	cial requirements for Incompatible ces.				
		the owner or coperator dispose of ompatible wastes in separate cells?	sometime to the first	An Guideliga Ang Alika Marian	4 Propert complete societics	makit tirminya agai anino o munung pagagar hilik paga aga aktiliko ne madar paga akti hingan kalamanangah lakasanana aktilik lakasanan aktilik lakasanan aktilik lakasanan aktilik lakasan akt
	If app	not, the provisions of 40 CFR 265.17(b)) ••••••••••	₩¢©xeeiasaH•	маналитеринди	#Menoralization
Like "	Spec (ef	cial requirements for liquid waste fective II-19-81)				
	State of the state	Are bulk or non-containerized liquide placed in the landfill?	The state of the s	unos de la companya del companya de la companya del companya de la	NO CONTRACTOR OF THE PROPERTY	Milestera wicks programme after a constitution of the constitution
	2.	Does the landfill have a chemically and physically resistant liner system?	M-grand and a		Millionakian remongy	I WW-Gizzaka nanang-u-Pika-musa nana-Pika-ka-nanang-udili-diananang ayog-ulikidika-nananal ^{Um} -nkanbung-uggi KRIZII kahikegu ni Pilikili.
	3.	Does the landfill have a functional leachate collection system?	USAUGENTOES TO THE	, sammer-eliging-1020	ботф ару <u>Е</u> рукалару.	
	4.	Are fee liquids stabilized prior to or immediately after placement in the landfill?	distribute 11 biology/1007	a Anno Carante Ng2	Helektologi, Alexande V	
(6)		cial requirements for Containers fective 11-19-81)				
	shr bef	empty containers crushed flat, edded, or similarly reduced in volume ore being, buried beneath the surface the landfill?		TAN GOARDAN/BRISINANCE	-теттредальны. «Ф	attivismi myönä Vavatavimmöörjan oli ameen älää tiin oo opinäälliiliili martarajalun myön ja ja mekasaasa suoja hälähilikkoisaisa häkken

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O and P INCINERATION and THERMAL TREATMENT NOT APPLICABLE

(A)	Facility Name:	enenga, gazga a All Parket Maria anna anggan ya Tib di	in 1888 to Million of Million of the	Carbonologico (Anamor) (Antonos Po	Mande and season 1971 for a first transcent and appelle	Webstermangen v. 100-1000 to the
	Date of Inspection:	over and a symptom of the state	eres Francisco (SATALANA)	ermente eriziek et avez en 1990ez et e	NEW TOTAL AND AND PROPERTY OF THE STATE OF T	å
	ĭ. Deter		on of	Steac	ly State	,
Å.	Type of unit (i.e., type of inciner					
8.	Components and steady state condit		HOROLON ELECTRICA DOPAL I PRÓPIOS	TSOPMASSESSYN GALENCY (PPPPSSEŽAV	THE STATE OF THE S	The Collection and Grant Collection (Collection Collection Collect
		女女女女	Was	this (componen	t at SS prior to adding waste?
	Component		Yes	No		Remarks
] =			constanting.	construction of the second	эфессионалу	$+ - \Phi_{\rm BCD} \times 1000 \times 1000
2.	$= \sum_{i=1}^{n} (1/2^{n+i} + 1/2^{n+i} + 1$		C-PCCON-market	######################################	CALIFORNIA CASSACCIOS	$^{\rm vectors} A_{\rm c} = 0.0000000000000000000000000000000000$
3.	report, virtulning growing, this is that expressing significant mengal literal ballations become a facility of the color o		rumann oxyegy (i) jy		njejat (Marina)	Www.engus ^{alan} ii.com.com.com.com.com.com.com.com.com.com
4.	AND TO A NEW YORK OF THE PROPERTY OF THE PROPE		Wilmanianorarianoco	www.com	9.694(2)4)4.61((((((((((((((((((((((((((((((((((((Partice increased which control control and control co
						WATER DESCRIPTION OF THE PROPERTY OF THE PROPE
	ity, warrenty than a man war war war and a man a state of the state of		num-quito-mimunetr	-completences reserve	namon/namon-en/C	Anterestablishung gerupat gerupat gester den gerupat gester gester gester gester den gester den gester gester den gester
	g di di mercat	I. Was	te Ar	<u>nalysi</u>	C. T. J.	
As	Minimum requirements, for wastes n	ot prev	rtous]	ly bur	ned/trea	ated.
	1. Required analyses; has an analysis been performed for the following:	}	Yes	No	N T &	Remarks
	a. Heating value		SOUNT AND PROPERTY.	ಕಾರ್ಯಾಪಿಸಲು	глантоголору нь 1 <u>(г</u> .	$+ result + \rho_{1} - resultant + \rho_{2} - resultant + r$
	b. Halogen content		#-Quintercorycop	<i>فىللىدىدەرى</i> ن	orange magazina	
	c. Sulfur content		والمستعدد	ಇವರ ಗಡುಳು-೧೯೩	Control Security	$-4 \exp(-i\theta R + i\phi n \cdot \cos(\theta R + i\theta R + i\theta R + i\phi \cdot \cos(\theta R + $

Yes No N. 4 Remarks

	 Documented, written data may be substituted for analysis for these. Are either present for: 				
	a. Lead?	gygddiffdliolaw ng	es. No popular i est	Mathematic in State	The region of the removal of Art The region of the Control of the Residence of the Control of the Residence
	b. Mercury?	rangeryp FASTETNL 1 VI.v	Charles of State	Talahanishara Meta	Exercise T-20 in money T-20 in
8.	Other parameters for which the waste is to steady state or determine the types of postermarks any which you feel should be test to be a second to be the second	ollutan ed for	its wh		
	Angelle of the second control of the second	and Antonios (Million Co.) (1945)			THE STATE OF THE LESS AND A STATE OF THE LESS AND A STATE OF THE STATE
		Гостованням (³⁰ чидосетт			$-\infty + \infty +$
	A STATE OF THE STA				Eduph and Artific and WEET Private, WHIT I ARTIFIC AND THE Private I WEET School and WEET School and Artificial annual production of the Control of the Cont
	The state of the s				successful and considered and constraints of the
	vor 1994 III. Monitorii			ctions	
	чесы мері-апшы ғалыма сартіой он интесней ^{доро} ны факсоноров ^{до} БРГГГ надосенняй	Yes	THE WASTERN STREET, ST	NI*	Remarks
A.	Combustion/emission control instruments monitored at least every 15 minutes	финентический предоставлений предост	annual Providences.	one-was-physicane	t stage of the sta
8.	Steady state "maintained or corrections attempted?	-2/ 	ages distributions of the second of the seco	*****	· www.com-to-delicent-to-delicents (the-reducers com-to-ensurem-address convey paging a company to deep paging and continued paging and continued to the contin
C.	Stack Plume observed at least hourly for normal color and opacity?	ngu Validitendi vananensy	Фашисладу/ Фиг	A SOUTHER SECTION OF THE	
D.	Did any stack observations made by owner or operator show a plume dif-ferent than normal?**	- egycliffiffallarinin	TREASURE PROPERTY OF	NET neovembern der	wasses find necessary figure recovery constitutions and against another constitution is a second of the discharge field and beginning the constitution of the constitu
E.	If yes to D above, were corrections made to return emissions to normal appearance?**	W STARTSANT	Three constitution of the	wheter in the second of the	resissance and in the research and a commence of the commence
**** «	Complete unit and associated equip- ment inspected daily for leaks, spills, and fugitive emissions?	Инкосерству «Терренту»	MARINE CONTROL	graphic landers of the	
	Emergency shutdown controls, system alarms checked daily for proper operation?	Printer Artifle of recognition	rey-gy/a sound pa	adais, da 4000 40 754	. where to some Construction and Construction and the construction and t

^{*}Not Inspected
**Specify in Remarks for what period of time this was checked.

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NOT APPLICABLE IV. Open Burning

۵	Anly	comolata	thic	nart	1 1	the	facility	onen	burns	hazardous	waste.
/ N 10	WHIY	LUMB ECC	- 0 (1 1 1 D	34 SE 1 S		€ 5 8 €.	- 3 545 to 3 8 11 So 3	was and a	90 6 6 2 3 5 4 C	the said of the sa	32.64 49 11 11 11 11

		Yes	No	A STATE OF THE STA	Remarks
Personal distribution of the state of the st	Does this facility burn <u>only</u> waste explosives? (A No answer means <u>other</u> hazardous waste is open-burned.)	Editoritalists with	ugg-nossen Addrigs	ahid Annoqua (eng	\$ 4 which was for the confidence and confidence an
2 **	If this facility open- burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	ಕರ್ಷ-ಕರ್ಯವನಿಸುತ್ತಿ.	cog <u>man</u> (Norm in	distribute equipme	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the
************************************	property of others
0 to 100	204 m 670 ft
101 to 1,000	380 m 1.250 ft
1,001 to 10,000	530 m 1,730 ft 690 m 2,260 ft (

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

(FOR OUSSTRANGER ONLY)

Fac:	ility Name: Acciso Casaicas Core, Deres	E. m. Slineti	PANI		•
Date	e of Inspection: <u>Dc.8,7981</u>	and the second of the second o			
		yes	No	N. *	Remarks
Commission of the Commission o	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	Security of the Security of th	sab#/Gwancow.	Mn453ialM5aahga	Фермери комптонарат се по 2000 година предоставления Ферменарии объектории об
2.	Is a continously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)				nes spellable

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		Voc	5	\$1 ° - 10.	The course of source or
		155	140	1.4 T	Remarks
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?				NOT APPALICABLE.
ď		*A countTEMESTINGA	#PECALITY CONTRACTOR	Antiques (n) in security (sq.	Photo-argue, promoter and account of the control of
Sign of	Are inspection procedures followed according to 265.403?		eller of Justice, PASE:	malama Marka (Str. 198	The commence of the control of the c
E.	Are the special requirements fulfilled for ignitable or reactive wastes?	National challenges half	1804. migrasyawMik	Store, organizacje,	Malantin Burker Land Charles and considerate and considerate and considerate and considerate and considerate a
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.)	ASSOCIATED FOR STORM	Service Martine Language Const.	spowerstand.	Material and the second consequence of the second control of the s
	waste regulations in 40 CFR Parts 122 wastewater treatment tanks that recein hazardous waste or that generate, sto is a hazardous waste where such wastewable or 307(b) of the Clean Water Act tanks, transport vehicles, vessels, on hazardous only because they exhibit to are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently states and disposal.	ve, some or water (33 Ur con he co Subpa	tore, treat sare .S.C. tainer rrosiver D o	and tre a wast subject 1251 et s which ity cha f 40 CF	at wastewaters that are ewater treatment sludge which to regulation under Sections seq.) and (2) neutralization neutraliz wastes which are racteristic under 40 CFR §261.20 R Part 261 only for this reason.
	1. MANTE	ST RE	QUIREM	ENTS	
		Yes	No	NIX	Remarks
(A)	Does the operator have copies of the Manifest available for review?	<u> X</u>	an anomalysis distant.	econograms(street	California de California d
(8)	Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
	1. Manifest document number?	X	нь призметите	(Philamenu-104)	· · · · · · · · · · · · · · · · · · ·
	 Name, mailing address, telephone number, and EPA ID Number of Generator 	X metanan	no- decemben (PPINSE)	«Феннептин»—«С?	on the control of the design of the control of the

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			Yes	No	A A	Remarks
	3,	Name and EPA ID Number of Transporter(s)?).* A.	**************************************		
	4,	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X removement	VITAST-LEVI-1084	A so supplemental terrologica.	
	5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	* X	· ************************************	\$P\$_EDY_PAGES	
	6.	The total quantity of waste(s) and the type and number of containers loaded?	X	・ ド ・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア・ア	€FF4MEENY-populajs	
	7.	Required Certification?	<u>X.</u>	HPSOCIAL PROGRAMMS	*Achinique etinoperophyr	
	8.	Required Signatures?	X essential and a second	CALCULATE PROTESSOR	49553MALETSALA maga	
(C)		s the Owner or Operator Submit eption Reports when Needed?	Water Institute of the State of	V	Servilleton julijanska	OCCASSION MAS NOT PET ARISEMenters residence recommendation of the commence of
		2. PRE-TRANSPO	RT R	EQUIRE	MENTS	
(A)	wit (Re	waste packaged in accordance h DOT Regulations? quired prior to movement of ardous waste off site)	X waana	Онайтельна	**ort-min-scalings/a*	·
(8)	in con (Re	waste packages marked and labeled accordance with DOT Regulations cerning hazardous waste materials? quired to movement of hazardous te off site)	and the second second	элиги-манифактур	198-defensementen	
(C)		required, are placards available transfer?	7507-XIII 78500 D-112	ченняй часта стана	vicinistry consistency	NOT APPEICABLE

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				in the second		
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				* •		
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	,					

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

		Yes	No		Remarks
**************************************	Are containers marked with start of accumulation date?	<u> X</u>	Ф nabh dhe ni ig yeggany	.dMcCleOdJ)graps	
Z e	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	X	Meritalnos escas	SPMARN-Julius no	
Ĵ _a	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, container holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	S. S	MAGDir-Masorin	ned Smillfillers (Masses	THSPECTON OF CONTAINFES DONE DSILY continuous account anno account a
4	If wastes are stored in tanks, are the tanks managed according to the following requirements?	MOT	- 101	PUCAB	The time the second sec
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	montana integral (n dig	· Commenter of the comm	*doualtr/warnesson	SERVICE SERVICE OF A SERVICE VERSION OF A SERVICE SERVICE OF A SERVICE
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	\$5000000000000000000000000000000000000		MM KIRON TOWNSHIP (MISS)	BOOM FOR A CONTROLLED SAN OF A STATE OF A ST
	c. Do continous feed systems have a waste-feed cutoff?	annowing the control of the control	191 0 (Special Laboratory)	*62Autoconomism	normal financial and a committee of the
	d. Are required daily and weekly inspections done?	าลัสระกับเคลืองเกมาก	1990 filler disconsissoner	NOVATO VILLED MAIN IN	ether decided as a second of the company of the com
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	SSE(USF/MUSICINA)	Waterministation	УНИЧНИКИ ПЕТЕ	
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	4entulZddti0354un		minegii-vAAn-vije)	
	**		V	ş-	

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VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

				Yes	No	117	Remarks
(A)	Exce resu	ptic Its	fests, Annual Reports, on Reports, and all test and analyses retained for three years?	no antiferrancia	QPROTESSION OF	whose the state of	
(8)	Annu	al F	Generator submitted Reports and Exception as required?	pp aggreen had had a green and	Newspagagagagaskidy	ертара ботынал б ^а й	NOT LIPLI OS SE sammento recepció con control trades que troma que de la que de la constitución de como se los conscientes con control con control de la con
			VII. INT (Part	ERNATION 262, Su			
(A)			installation imported rted Hazardous Waste?	the control of the second	. Lieu	stead (Notices Sign	Position Provide cases (Provide au Son Australia (graft) and copy of the copy
			(If A was answered Yes, then	complet	e the	followi	ng as applicable.)
			· AFFT /3.	PLICAB Z	E		
	*		orting Hazardous waste, a generator:		G COTAL AND		
		ð.	Notified the Administrator in writing?	And the second s		The Charles were provided as a	Visioners and company of the more and company of the company of th
		5.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in foreign country?		The second secon	*like on earliff 4 mans	e vinner eg men my von se vygeng er er e vinner va gilmen prop fil en men gy er enne vygene mæng plette eggy fil bæren fil forste fil filme
		C.	Met the Manifest requirement	57	i managamagasinna	3/83/600088 ₀₀ 1003	. Негос и 18% стипаций от принути и от 66 метра 200 быть поделення поделення страй выпосня в 1860 году принути
	. 2.		orting Hazardous Waste, the generator:				
		a.	Met the manifest requirement	557	and Alexandralistations	бор-доссительны <u>е</u> Д.П.	
				S. C.			
	ı						
						1	

NOT APPLICABLE

TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

1. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

		Vac	No	N1×	Remarks	
(A)	Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	E Var val	S S /CE	E G S	TE TO ESTATE TO THE TOTAL THE STATE OF THE S	ann in a g-Painta magnatabh an Saidh i da na cain mhighr (Albhann 1887 18 aig na Ghliach
	II. INTERN	VATIOINA	L SHIF	MENTS		
A	Does the Transporter record on the manifest the date the waste left the U.S.?					
£.,	Are signed completed manifest(s) on file?	Altrophosocopy and	**************************************	- General mass Aug	ndicason negerida principales o con principales (see superior supe	
	V _a I	MISCELLA	NEOUS			
A	Does Transporter transport hazardous waste into the U.S. from abroad	The obligation of the state of	All Philipson programs	, - 1550 Tandla cang-	Market has considered distribution arrange from the continue of the distribution of the continue of the distribution of the continue of the co	
8.	Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?					
		Table de la constante de la co	distribution ##ED	Printenaugaja)		
NOT	comply with the Generator regulation	hen the		. %	is also a Gen	erator <mark>and must</mark>

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				4.4
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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

THE PLANT DISTILLS CRUDE CORE CUEN TAR, OBTAINING RESIDUAL PITCHES, CREOSOTE OILS,

§ NAPTUALENE - RICH OIL. THERE ARE NO WASTE-STREAMS PRODUCED AS SUCH. ALL WASTE IS

SPILL RESIDUES, SAMPLE CAN RESIDUES, LEAKS, ETC. - 1.E., LOST PRODUCT. THIS IS

SOLIDIFIED AND TAKEN TO A LICENSED LANDFILL (WAYNE DISPOSAL #2).

THE WASTEWATER (PROPOSED "PROCESS WASTEWATER FROM CREOSOTE PRODUCTION") CONSISTS OF NON-CONTACT COOLING WATER, STEAM CONDENSATE, AND STORM WATER RUN-OFF FROM THE ENTIRE PLANT PROPERTY. THIS GOES TO A SURGE TANK. IF IT EXCEEDS DETROIT MUNICIPAL SEWAGE LIMITS FOR PHENOL, IT IS TREATED WITH BACTERIA, THEN RELEASED TO MUNICIPAL SANITARY SEWER.

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INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C. D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	catio	process(es) (EPA Form 3510-3) Inspe	ection Form /	A section(s)
501	X	storage in containers		I
\$02	П	storage in tanks		J
тоі		treatment in tanks		J
\$04	II	storage in surface impoundment		K,F
T02	II	treatment in surface impoundment		K,F
D83	\prod	disposal in surface impoundment		K,F
\$03		storage in waste pile		L
D81	II	disposal by land application	,	M,F
D80	Ì	disposal in landfill	•	N, F
Т03		treatment by incineration		0/P
. T04		treatment in devices other than tanks impoundments, or incinerators	, surface	Q
Other activitie	<u>s</u>			
GENERATO	R X		APPENDIX	GN
TRANSPORTE	R 🎞	DECEIVED UAN 14 1983	APPENDIX	TR
		ACT 64		
45. 45. 4.				

Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

N.A.

Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

page 3 of 5 12,000 U line 2 tine 4 1,000,000 6 502 line 3

cc: Al Howard (2) allied The notification was for a proposed waste (process waterwater from creosote production) that has never been listed and is not

	v			· ·	

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B) YES NO NI* Remarks 1. Has the Regional Administrator been notified regarding: 265.12 Receipt of hazardous waste from a foreign source? Facility expansion? c. Change of owner or operator? General Waste Analysis: 265.13 a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? b. Does the owner or operator have a detailed waste analysis plan on file at the facility? Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 265.14 24-Hour surveillance? ٥r b. i. Artificial or natural barrier around facility? and ii. Controlled entry? Danger sign(s) at Sign at HWSF entrance? Owner or operator inspections: 265.15 Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?

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			:

YES	NO	NI	Remarks
3 6	110	19.4	IV COURT IN CO.

	þ.	have	the owner or an inspection e facility?			X -		<u> </u>	7 1	sion to	
	C.	If so the i items	nspection of	hedule address the following					include 20 yrd	only	
		i. n	nonitoring equ	ipment?		ه سندخم		· -	N.A.		
	-	ii. s	safety and eme	rgency equipmen	it?	X.	 -		5x.p.	Schi	
	i	ii. s	security devic	es?		X.			Sep.	5ch.	
		iv. (operating and ment (i.e. dik	structural equi es, pumps, etc.	p-)?	X.			den siden sette mense se ^{tte} de la resus di den 23 des 20 des 10 de 10		
		•	for during the	ems to be looked e inspection (e. , defective pump	. g.	X	···········				•
			inspection fro the possible o of the equipme	equency (based deterioration reent)?	upon ate	×					Ge
	d.		areas subject aily when in	to spills insp use?	ect-	X		*	n		
	e .	an i	the owner or nspection log er or operator	operator maint or summary of inspections?	ain	2	Naint-Gameric Stand SEE		SSANNAL		
	f.		the inspecti owing informa	on log contain tion:	the						
		i.	the date and	time of the ins	pection?	X				· · · · · · · · · · · · · · · · · · ·	<u>-</u>
•		ii.	the name of t	he inspector?		X	·		and the same of th		
			a notation of made?	the observation	ons	X		dinakaniyan — A	All has the state of the state		
		1 V .	the date and repairs or re	nature of any emedial actions:	?	X		t	Advertisement Company of the Company		m
5.	Do perso include:		training recom 65.16	rds							
	ā.	Job	titles?			X	Webbell 1999	واسترات مالاته	400 Charge for Communication and Alexander conductives		******
	b.	Job	descriptions	?	•	X	<u> </u>	******		on the second	
					5.0					•	

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			YES	NO	NI	Remarks
	C.	Description of training?		emphonic and	-	
	d.	Records of training?	X			
	e.	Did facility personnel receive the required training by 5-19-81?	X	enterminate de l'architecture		± ↑ ·
	f.	Do new personnel receive required training within six months?	X		Schrieminnisti e	
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	<u> </u>			
4	rec	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.	17	-		•
	۵.	Special handling?	02/00-000-000		G-way-timeses*	NA.
	b.	No smoking signs?	standard Consta	· · · · · · · · · · · · · · · · · · ·	-	NA
	C.	Separation and protection from ignition sources?	dans to Tomillo			NA

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

6	Maintenance and Operation of Facility: 265.31	YES NO NI	Remarks
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	<u>×</u> <u>×</u> _	
2.	If required, does the facility have the following equipment: 265.32		
	a. Internal communications or alarm systems?	X — —	ADT. any emerg. outside
	b. Telephone or 2-way radios at the scene of operations?	<u> </u>	Walky Talky
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u> </u>	In house fire Dept. Total facility contained
	Indicate the volume of water and/or f	•	ire control:
	Fire Station - 2 BIKS away	- has Foam	
3.	Testing and Maintenance of Emergency Equipment: 265.33	, ,	
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u> </u>	
	b. Is emergency equipment maintained in operable condition?	<u>×</u>	
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	<u>×</u>	
5.	Is there adequate aisle space for unobstructed movement?	<u>×</u>	
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		6
	at the facility?	C-1	and nove had towns w/
			# 1 % T & #\

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Section D:	CONTINGENCY	PLAN AND	EMERGENCY	PROCEDURES:	(Part 26	5 Subpart	D

YES NO NI Remarks

1.	Does	the	Contingency	Plan	contain	the
			information		265.52	

a. The actions facility personne?

must take to comply with
§265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Countermeasures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

 Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

		N.A.		
		COM DAR	v fire	department
	***************************************	 ADT automb Fire + Police	atiently c	outacts
		Fire ofolice	e pepis.	tainted
4		- 1 + + -	+411 1011	I all -

<u>X</u>_____

at site only

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		LE2 NO	MT	remark s
3.	Emergency Coordinator 265.55			
	a. Is the facility Emergency Coordinator identified?	<u>×</u> _		Note and the Control of the Control
	b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>×</u> _		e suit de l'annue de l
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	*_	· · · · · · · · · · · · · · · · · · ·	
4.	Emergency Procedures 265.56	•		
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			N. A.

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				•	
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			Se	ection E:	MANIFEST SYSTE	M, RECOR	DKEE	PING,	AND RE	PORTING:	(Part	265 St	ubpart	E)
							YES	NO	NI	Remarks				
* 1	٠	Use	of M	anifest Sy	stem 265.71									
		a.	proce proc (Parthe gene	edures li essing ea ticularly signed ma	ity follow the sted in §265.71 ch manifest? sending a copy nifest back to nin 30 days aft	of the			STEEL (speeds description)	Quadratina mandan nyanya sayan			• • • • • • • • • • • • • • • • • • •	
		b.		records o ined for	f past shipment 3 years?	S					····	,	750°C	**************************************
* 2) - •	req	uirem		operator meet rding manifest 265.72					\				
. 0	f (on-s	ite f	facilities	ers or operator that do not m off~site sour					No	A.			
3	3.	0pe	ratir	ng Record	265.73									i
	·	3.	mair	ntain an c ord as rec			X	e e e e e e e e e e e e e e e e e e e	ES-400-EE11115	as	- <u> </u>	Neab	le_	
		b.	conf	s the oper tain the s ormation:										
	•		i.	of each storage,	od(s) and date(waste's treatment or disposal as in 40 CFR Part I?	nt,	X	 -		fro	M.	Man	ifes	ts.
٠			e e e e e e e e e e e e e e e e e e e	each haz facility should b to speci	tion and quanti ardous waste wi ? (This inform e cross-referen fic manifest nu was accompanie ifest.)	thin the ation ced mber,			·.	N.	A,		Orași de substitutul de la companya	
		***	iii.		diagram of eac disposal area	h .								

^{***} only applies to disposal facilities

	·	•	·

-1,	٠٠,		YES	NO	NI	Remarks	
	·	showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		directalentials (SSI)		N.A.	
	ίv	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X		Christianis		-
	٧	Reports detailing all incidents that required implementation of the Contingency Plan?	COMPRESSED IN			W.A.	-
	Vi	All closure and post closure costs as applicable?	X		. 		•
ø	Avail	ability of Records 265.74					
٠	under	all facility records required - 40 CFR Part 265 available for ection?	<u>X</u>	·	es esterosamento		
. *	*Unma	nifested Waste Reports 265.76					
	! !	las the facility accepted any nazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?		-	nto marcanismo	N. A.	
	,	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.		of the Name of the	nikasor, rosiz Horizo		

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

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Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

			YES	NO	NI	Remarks
1.	faci	the owner or operator of the lity implemented a ground- er monitoring system? 265.90		maid SEA SEPA		takka kansa sa s
	If "	no", Skip to number 11.				
2.	faci grou	the owner or operator of the lity implemented an alternate undwater monitoring system as cribed in 265.90(d)?	distribution of the state of th	egonologicologico.		
		'yes", skip to number 12. 'no", continue				
3.	s.ys1	s the groundwater monitoring tem meet the following re- rements of 265.91:	N.	A.		
	ã٠	At least one well installed hydraulically up-gradient from the limit of the waste management area?		• 4 25		•
		Indicate the total number of up-gradient wells.				
	b.	At least three wells installed hydraulically down-gradient at the limit of the waste management area?		LL KEPROVIED	_	
		Indicate the total number of downgradient wells.	مدور وميان الرواد -			
	C.	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?		r	imite foressens	

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Sketch the locations of the wells relative to the waste management area.

				YES	NO	NI	Remarks
	d.	Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?					
4.	deve wate plan	the owner or operator eloped a written ground- er sampling and analysis n that includes procedures techniques for: 265.92					
	ā.	Sample collection?	Ì		-		
•	b.	Sample preservation and shipment?			(CONT.)		
	C.	Analytical procedures?				411	
	d.	Chain of custody control?		Simonisho		ano-	E-90-Hamiltonian—mino+-900- ¹¹¹ +- ¹¹¹ -0-4000-0
5.	fol	s the owner or operator low his groundwater sampling analysis plan?				————————————————————————————————————	
6.	ana	the groundwater sampling and lysis plan maintained at the ility?			**************************************	· .	
7.	min of par anc	the owner or operator deter- ed the concentration or value all the groundwater monitorin rameters of 265.92(b) in accor e with paragraphs c and d of 6.92?	9	Samulation (Samulation (Samu			dynahagan mananan mananan kan samakan sikasan saman mahakan sala 1777 (1878)

		:

•			YES	NO	NI	Remarks	
	an <u>c</u> wate	the owner or operator developed outline of a comprehensive grounder quality assesment program that capable of determining: 262.93					
	ð.	Whether hazardous waste or hazardous waste constituents have entered the groundwater?	No.	- Oranne	Na vancana de	W	anneau.
	b.	The rate and extent of migra- tion of hazardous waste or hazardous waste constituents in the groundwater?	Финасипаль		Millioner.	***	
	C.	The concentration of hazardous waste or hazardous waste constituents in the groundwater?					
*9.	a s' wat	the owner or operator performed tatistical analysis of his grounder monitoring data as required in .93(b)?		Control of the Contro	<u>x</u>	er tot - 10 had de - advar- ann denne de Bankon anabran son	
10.	inc	there a statistically significant rease (or pH decrease) detected ir well?		w.c.	<u> </u>	*	
	ā.	If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?		· ····································	<u> </u>		······································
		Skip to number 14				•	
T	wri	the owner or operator prepared a tten groundwater monitoring waiver constration for the facility?	^	, 			
	a.	Is the waiver demonstration maintained at the facility?		5 	e-consiste		
	b.	Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	e	5 <i>ma</i>	D PriceMannie		o o u na

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

^{*}These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

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		YES	NO	N1	Remarks
12.	Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?			-	About 1 - Commission of the Co
	a. Has the plan been certified by a qualified geologist or geotechnical engineer?		(NOCOPOLITO		
	: If the plan for an alternate groun he Regional Administrator the inspect				
13.	Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?				
14.					

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Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

		YES NO	N I	Remarks	
١.	Closure 265.112				
	a. Is the facility closure plan available for inspection?	<u>X</u> _			The state of the s
	b. Does the plan identify:				
	i. maximum extent unclosed dur- ing facility life?	· · · · · · · · · · · · · · · · · · ·	atalaste-editoritoritor	N.A.	
	<pre>ii. maximum hazardous waste in- ventory?</pre>	<u>X</u> _	###		yh-ah-ah-an-an-an-an-an-an-an-an-an-an-an-an-an-
	iv. estimated year of closure?	<u>X</u> _		The state of the s	
	v. schedule of closure activities?	X _	Carlo Company		
	c. Has closure begun?		2000-10-10-		
2.	Post-61 osure 265.118				
	a. Is the post-closure plan available for inspection?	quantum margo quantina de la companio della companio de la companio de la companio della companio della companio della companio de la companio della compani	**************************************	and the state of t	
	b. Does this plan contain:			4	
	i. description of groundwater monitoring activities and frequencies?				
	<pre>ii. description of maintenance activities and frequencies for</pre>				
	AA. integrity of cap, final cover, or containment structures, where applicable		V-STEETinneblackfe		
	BB. facility monitoring equip-	_			
	ment iii. name, address, and phone number of person or office to contact during post-closure care perior				
	c. Has the post-closure period begun?				
	d. Is the written post-closure cost estimate available? 265.144	to and displacements of the angular (1922).			Michael Commission of the Comm
*Ap	plies only to disposal facilities.	G-1			4/82-A

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Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks
١.	Are containers in good condition? 265.171	<u>X</u> _	-spannexity-sp-	
2.	Are containers compatible with waste in them? 265.172	X_	develalemente	
3.	Are containers managed to prevent leaks? 265.173			Welded joints - rubber seal on ga
4.	Are containers stored closed?	400 balance kom Ger	NA.	Container is 2011 rod off
5.	Are containers inspected weekly for leaks and defects.	Ł_		no threat of overturning waste is solid no threat from evap, precip or spil
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the	265.776	(Company is in process of roofing storage area.
	facility property line? (Indicate if waste is ignitable or reactive).		4000 mensilada	N.A.
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			N.A.
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	manuscripti factorismos		N.A.

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Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures? 3. Do continuous feed systems have a waste-feed cutoff? 4. Are waste analyses done before the 265.193 tanks are used to store a substantially different waste than before? 5. Are required daily and weekly inspections done? 265.194 Are reactive & ignitable wastes in tanks protected or rendered non-265.198 reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 7. Are incompatible wastes 265.199 stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? gallons Tank capacity: Tank diameter: feet Distance of tank from property line (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

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Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

7	Do surface impoundments have	YES	NU	N1	kemarks	
1 6	at least 60 cm (2 feet) of freeboard? 265.222	www.iconsinelido	, 6			
2.	Do earthen dikes have protective covers? 265.224	Angelika Maringan		was a such a modela		÷
3.	Are waste analyses done when the impoundment is used to store a substantially different waste					
	than before? 265.225					
4.	Is the freeboard level inspected at least daily? 265,226	kéartiraitariii			**************************************	
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	Secretaria de la composición del composición de la composición de la composición de la composición del composición de la composición del composición de la composición del com				
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229		Voncent de listellino			_
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR					

NA

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Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	NO	NI	Remarks		
•	Are waste piles covered or protected from dispersal by wind? 265.251		***************************************		$q_{-1}(q_{2},q_{1})=\max_{i}q_{1}(q_{2},q_{2})=q_{1}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}(q_{2},q_{2})+q_{2}$	ann ann ann ann an ann an ann ann ann a	Marine Marine Marine
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252			Management of the Control of the Con		million million million did million did million di seccessorie e e e e e e e e e e e e e e e e e e	Agree 1
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	*ANVEX************************************	evereculsusti)	ence of translations			and the same of th
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256						.
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	en e de la companio d	vond kr i ndal de	Polyamore difficults	-		
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	Simus (San San San San San San San San San San	***************************************	филорентерия			ZANISSON (PANIS), AND SERVE (PANIS)
7.	Are piles of incompatible waste protected by barriers or distance from other waste?						

N.A.

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Section M - LAND TREATMENT (Part 265, Subpart M)

	•	YES NO	NI	Remarks	
0	Is treated hazardous waste capable of biological or chemical degradation? 265.270	фациянт цент	word*widefellik	``	
2.	Are run-off and run-on diverted from the facility or collected				
3.	Is waste analyzed according to 265.273?				
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?		Militaria		
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	\			
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?				
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279		o withinst	e de la companya de l	
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	\		- Constitution - Cons	
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	namationista assessing			
		M-1		$\left\langle \left\langle \right\rangle \right\rangle$	4/82-A

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Section N - LANDFILLS (Part 265, Subpart N)

			AF2	NO	N I	Kemarks	
1.		eral Operating Requirements 265.302 s the facility provide the following:					
	a.	Diversion of run-on away from active portions of the fill?	-	абакко-жерили-	NESSECONOMICS CON		
	b.	Collection of run-off from active portions of the fill?					
	c.	Is collected run off treated?	t-us-sumir	mo-contributions	44AV	6-turn-shirus	
	ď٠	Control of wind dispersal of hazardous waste?					
2.		veying and Recordkeeping 265.309 s the Operating Record Include:					
	a.	A map showing the exact location and dimensions of each cell?					
	b.	The contents of each cell and the location of each hazardous waste type withing each cell?	stransivoro (LO	· ·			
3.	rea act mix act	cial requirements for ignitable or active waste. Are ignitable or retive wastes treated so the resulting cture is no longer ignitable or retive? (Indicate if waste is ignitable reactive.) 265.312		ma ⁿ tibras tilmäätö	April Constitution (Constitution Constitution Constitutio		
4.		ecial Requirements for Incompatible stes. 265.313					
	of ce	es the owner or operator dispose incompatible waste in separate lls? (If not, the provisions of CFR 265.17(b) apply.)	1				

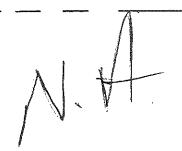
Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

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- Special requirements for liquid waste 265.314
 - a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.
 - i. Does the landfill have a chemically and physically resistant liner system?
 - ii. Does the landfill have a functional leachate collection system?
 - iii. Are free liquids stabilized prior to or immediately after placement in the landfill?
 - b. Have containers holding free liquids been placed in landfill since March 22, 1982?
- 6. Special requirements for Containers
 Are empty containers crushed flat,
 shredded, or similarly reduced in volume
 before being buried beneath the surface
 of the landfill?



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þ.	Comp	oonents and steady state condit	ion: I 265.	343 T	265.373	etter grootstaa 1900 til 1914	+ -· `
	Was	each component at steady state	prior to ad	ding wa	ste?		
		Component	YES NO	NI	Remarks		يستنيع برجي والمتابع المتابع والمتابع والمتابع والمتابع والمتابع والمتابع والمتابع والمتابع والمتابع والمتابع
			Continuation Contraction	Great remainer.		· · · · · · · · · · · · · · · · · · ·	
			validadidii	tor (Lock STAII)			A STATE OF THE STA
. <u>Wa</u>	Min	nalysis I 265.345 imum requirements, for wastes previously burned/treated.	T 265.375				
	i.				-		
		Heating value			the state of the s		- c- · · · · · · · · · · · · · · · · · ·
		Halogen content		QUIN CONTRACTOR			
		Sulfur content	\ \ !			; Portylkkinskenskild fillery Cliep Giornick-philipsenskerensensker	and the second second
-		Has documented or written data	à				
	ii.	been substituted for analysis of either:		N.			
	11.		Managaman Makakaban			e de la companya del companya de la companya del companya de la co	

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	b.	List other paramters for which the waste establish steady state or determine the t (Note in Remarks any which you feel should	types	of po	llutant		
		X 055 047	YES	NO	NI	Remarks	
3.	Mon'	itoring and Inspections I 265.347 T 265.37				•	
	3.	Are combustion/emission control instruments monitored at least every 15 minutes?		· · · · · · · · · · · · · · · · · · ·	LANGE TO SERVICE		
	b.	Is steady state maintained or corrections attempted?	in/olesii saas				
	c.	Is stack plume observed at least hourly for normal color and opacity?	<u> </u>	ar ^{ne} rienskinsville			
	d.	Did any stack observations made by owner or operator show a plume different than normal?**	***************************************				
	e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**		AND THE PROPERTY OF	ر مانسون	Named State of State	
	f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	· ·	Demonstratificanism			
Ą		ecify in Remarks for what period of time is was checked.	No. of the second secon				
	g.	Are emergency shutdown controls and system alarms checked daily for proper operation?		диг 4-инишес -		www.cindinabidod-niptiliod-niptiliod-niptiliod	
4.	0ре	en Burning T 265.382 (open burning does no	ot ap	ply to	incin	eration)	
	а.	Only complete this part if the facility open burns hazardous waste.					
		i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).		• .	· · · · · · · · · · · · · · · · · · ·		
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ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	burning or	stance from detonation of others	
0 to 100	204 m 380 m	670 1,250	
1,001 to 10,000	530 m 690 m	1,730 2,260	ft

N.A.

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Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

		YES	NO	NI	Remarks
.].	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	4 	4mrQQ-rushSidSQQ		
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?			GI nomen altitulio	
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?		-		
4.	Are inspection procedures followed according to 265.403?				
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	<u> </u>	dermananier der	4 	
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

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1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Sect:	ion B	B: MANIFEST REQUIREMENTS (Part 262, Subpar	t B)				
				NO	NI	Remarks	
(1)	Does ava	the operator have copies of the manifest ilable for review? 262.40	X	stranscool/server	t-rosvilvasvaskasaa		
(2)	moni	mine manifests for shipments in past 6 ths. Indicate approximate number of 2	7.	f ^	-20	yrds	containin
(3)	fol' cop fest	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				solids oste	containin
	a.	Manifest document number?	X			<u> </u>	·
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	X	~	₹ 4mm/kassanasia/like	, idinome Stimmer pa	
	C.	Name and EPA ID Number of Transporter(s)?	X				· · · · · · · · · · · · · · · · · · ·
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X		e dillertonicalistical	M	
	ۥ	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X		-		roosaasilaliisidekse vaalikse samma yyryym majilalijang
	f.	The total quantity of waste(s) and the type and number of containers loaded?	2			- · · · · · · · · · · · · · · · · · · ·	
	g.	Required certification?	X				
	h.	Required signatures?			w immuraktio	· · · · · · · · · · · · · · · · · · ·	
(4)	Rep	portable exceptions 262.42					••
	ā.	For manifests examined in (2) (except for enter the number of manifests for which t signed copy from the designated facility	he gene	erato	r has	NOT recei	ved a

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administra-

ment. O-None

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JECI	TOIL	C. TRETRANSIONI REQUIREMIS (1016 202, 30	inhair.	U J		
			YES	NO	NI	Remarks
٠,		waste packaged in accordance n DOT regulations?	, 20	NO	112	Nedlerks
	(Rec	quired prior to movement of				
	haza	ardous waste off-site) 262.30	017-10-10-10-10-10-		40-FWA-Charles	N.A.
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32			Quantities model designed in	N.A.
3.		required, are placards available to nsporters of hazardous waste? 262.33	X			
4.	was with and to	site accumulation of generated hazardous was te it generates either (A) in its storage fa h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects optio ns: See 40 CFR 262.34 January 11, 1982 Rev	cility restri ion A, n B, co	[265] icts a checl	.l(b) all a k thi] or (B) in accordance ccumulation to tanks s box 🔀 and skip
	ā.	Is each container clearly marked with the start of accumulation date?				
	b.	Have more than 90 days elapsed since the date inspected in (a)?	407-4479-4559-12500	#ESPECIAL PROPERTY CO.		
	C.	Do wastes remain in accumulation tanks for more than 90 days?	ess autor de conse	. ,		
-	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	. Chillip Wha	P COLUMN AND THE SECOND		
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	, Subpa	rt D)		
			YES	NO	£1 °	I Remarks
١.		e all test results and analyses	163	NU	I¥.	r vanark 2
		eded for hazardous waste deter-				
		nations retained for at least ree years? 262.40	×			
		i				
Sec	ction	n E: - INTERNATIONAL SHIPMENTS (Part 262, Su	bpart E	:)		
1.		s the installation imported or ported Hazardous Waste? 262.50	-mo	. <u>X</u>		
		f answered Yes, complete the following applicable.)	·	•		
	a۰	Exporting Hazardous waste; has a generator:				

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			4F2	NO	N1	Kemarks		
į.	Notified the Administrator in writing?			decerioração y.	- Ordinastical	procedurabella		·
	11.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?		manuscap,				
	iii.	Met the Manifest requirements?			Sarahoo ee ee ee	**************************************	**************************************	
) .	the g	rting Hazardous Waste; has generator met the manifest irements?						

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Appendix TR . .

_		AF2	ΝU	N	Ţ	Remarks		
Sect	ion A: SCOPE:					×		
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	, ,						
2.	Does the transporter transport hazardous waste into the U.S. from abroad?			_	- Top - deliberto			
3.	Does the transporter transport hazardous waste out from the U.S.?	la-man-referencie		_				**************************************
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?					er ^{an} tiservitarias cresta resta destind	:	
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	26	3,	Sub	part B)		
1.	Are copies of <u>completed</u> manifests available for <u>review</u> and retained for three years. 263.22					***************************************		man(q), quad de la companya de la co
2.	Estimate the number of manifests for shipments completed during the part 6 months.	**************************************						
3.	Examine a representative number of manifests. Indicate number examined.	ويدين سنديد		فسدنات فسخة		, i		•
4.	Did transporter properly sign and date the manifests examined?			-		O everale accommon ac		
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21					-	· · · · · · · · · · · · · · · · · · ·	
	If (5) is "no," skip 6 and 7.		- Alemann					
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	***************************************	, generales		alayeaman		***************************************	and the second s
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	PAY-ANNAL STREET	D	a543q256 a		en e		

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